

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. COMMODITY FUTURES TRADING	§	
COMMISSION, <i>et al.</i>	§	
	§	
Plaintiffs,	§	
	§	
v.	§	CIVIL ACTION NO.
	§	3:20-CV-2910-L
	§	
TMTE, INC. a/k/a METALS.COM, CHASE	§	
METALS, INC., CHASE METALS, LLC,	§	
BARRICK CAPITAL, INC., LUCAS THOMAS	§	
ERB a/k/a LUCAS ASHER a/k/a LUKE ASHER,	§	
and SIMON BATASHVILI,	§	
	§	
Defendants,	§	
	§	
TOWER EQUITY, LLC,	§	
	§	
Relief Defendant.	§	
	§	

APPENDIX IN SUPPORT OF RECEIVER'S
SIXTH FEE APPLICATION

Kelly M. Crawford, as the Court appointed Receiver, submits the following Appendix in Support of the Receiver's Sixth Fee Application, as follows:

Exhibit A	Invoices of Receiver's time and expense	pages 3 to 16
Exhibit B	Invoices of Scheef & Stone	pages 17 to 66
Exhibit C	Invoices of Brown Fox, PLLC	pages 67 to 80
Exhibit D	Invoices of Frost Brown Todd	pages 81 to 87
Exhibit E	Invoices of Ahuja & Clark, PLLC	pages 88 to 92
Exhibit F	Invoices of CFSI	pages 93 to 96

Exhibit G Declaration of Receiver Kelly Crawford pages 97 to 99

Dated: June 20, 2022

Respectfully submitted,

SCHEEF & STONE, L.L.P.

By: /s/ Peter Lewis
Peter Lewis
State Bar No. 12302100
Peter.Lewis@solidcounsel.com

500 North Akard, Suite 2700
Dallas, Texas 75201
Telephone: (214) 706-4200
Telecopier: (214) 706-4242

**ATTORNEYS FOR RECEIVER
KELLY M. CRAWFORD**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 20, 2022, I electronically filed the foregoing document with the clerk of the U.S. District Court, Eastern District of Texas, using the electronic case filing system of the court, which provided a “Notice of Electronic Filing” to all attorneys of record.

/s/ Peter Lewis
PETER LEWIS

SCHEEF & STONE, LLP

Invoice: 109212

May 5, 2022

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
7/26/21	KMC	Work on Claims Report and Appendix (1.00); telephone conference with CFTC regarding Defendants' counsel's insufficient disclosure of the source of their retainer (.50); revise letter to investors regarding Claims Report and conference with paralegal regarding same (.25); review letters from Defendants' counsel regarding the source of the retainer and compare to the transcript of hearing and obligations ordered by Judge Toliver and prepare letters to each of Defendants' counsel regarding their failure to comply with the order (1.25); communicate with Jessica and with CFTC regarding call from investor who was solicited by former broker of Defendants for investment in new gold company (.50).	3.50
7/27/21	KMC	Work on Claims Report, Appendix, and finalizing recommendations for claims (4.00); conference with G. Besen receiving three items of jewelry turned over by Batashvili (.25).	4.25
7/28/21	KMC	Revise and finalize Claims Report (1.50); revise and finalize Appendix in Support of Claims Report (1.00); conference with paralegal regarding metals claims (.50); telephone conference with CFTC regarding receivership (.25); telephone conference with P. Lewis regarding strategy for receivership (.25); prepare letter to send to non-metals investors (.25).	3.75
7/29/21	KMC	Finalize claims forms and package to be distributed to claimants and oversee distribution (2.00); prepare First Supplement to Claims Report to include in package and conference with paralegal regarding same (1.00); respond to attorneys for Defendants regarding disclosure of retainer information being insufficient and not in compliance with Judge Toliver's order (.25).	3.25
7/30/21	KMC	Review letter from Arnold Spencer regarding information provided by Lucas Asher in response to Receiver's questions and review court filing regarding same and prepare draft of response (1.50); have Claims Report and First Amendment to Claims Report and Appendix filed with the Court and send email to CFTC regarding same (.50); telephone conference with CFTC regarding claims (.25); review response of MagicStar Arrow refusing to produce documents and communicate with P. Lewis regarding strategy for same (.25); insure that all claims are finalized and mailed and that the claims report, amendment to claims report, and appendix are posted on the receivership website (.50).	3.00



SCHEEF & STONE, LLP

Invoice: 109212

May 5, 2022

Date	Atty	Description	Hours
8/02/21	KMC	Telephone conference with P. Lewis regarding letter to Arnold Spencer about discovery issues and other strategy decisions for recovering assets (.25); revise and finalize letter to Arnold Spencer regarding discovery responses and send to Arnold and others (1.00); conference with paralegal regarding handling calls after investors receive their claims recommendation and how to handle objections to recommendations and late filed claims (.50); prepare letter to general counsel of Intrinio (.75); prepare draft of letter to brokers inviting settlement (.50); obtain copy of Lucas Asher 2018 tax return and review (.25); conference with J. Rolls regarding preparing first supplement to motion to sell properties to reflect new contract on Wanamaker property (.25); communicate with broker about accepting offer for another Philadelphia property (.25); communicate with paralegal about getting utilities turned on a Philadelphia property under contract (.25).	4.00
8/03/21	KMC	Conference with J. Brandlin regarding status of forensic accounting of bank records and send to J. Brandlin CD with bank records (.50); telephone conference with CFTC regarding records (.50); prepare letter to Quinn Emanuel responding to its letter disclosing the sources of retainer funds (.50); prepare letter to Gene Besen responding to his email disclosing the sources of retainer funds (.50); communicate with A. Spencer regarding his need to amend notice to court and if notice is not being filed for me to file response to notice with the court (.25); conference with paralegal regarding Montana investors included in restitution judgment and communicate with James Stafford regarding same and consent decree requested from Montana (.50); review scanned documents and communicate with Alabama regulators regarding same (.25).	3.00
8/04/21	KMC	Prepare Response to Defendant Asher's Notice Regarding Court's July 1, 2021 Order and prepare Appendix in Support of Response and have filed with the Court (3.00); telephone conference with P. Lewis regarding Response and regarding email to counsel for MagicStar Arrow (.50); review and revise motion to sell Wanamaker property in Philadelphia (.50); conference with Andrea Cook regarding settlement letters to brokers (.75).	4.75
8/06/21	KMC	Review email to attorney for Carlos Cruz and confer with P. Lewis regarding same (.25); attend to inquiries from investors regarding claims recommendation, confer with paralegal regarding same, and communicate with N.M. regulator regarding same (.75).	1.00
8/09/21	KMC	Review each item of jewelry obtained and compare to list of jewelry provided by Fainche McCarthy and conference with P. Lewis regarding same; work on letter to brokers regarding settlement.	1.00
8/10/21	KMC	Conference with P. Lewis regarding strategy as to Carlos Cruz and Portfolio Insider (1.00); prepare outline of motion for contempt to file regarding Portfolio Insider (.50); conference with Avi Steinberg regarding broker's commissions and commissions to David Bleeden (.25); communicate with investors answering questions regarding claims (.25).	2.00

SCHEEF & STONE, LLP

Invoice: 109212

May 5, 2022

Date	Atty	Description	Hours
8/11/21	KMC	Gather information regarding brokers and conference with Andrea Cook regarding sending letters to brokers as to settlement (.50); telephone conference with CFTC regarding contempt of Asher and Batashvili and conference with P. Lewis regarding same (2.00); review bank records and request counsel assisting with BOA to request updated production (.25); begin preparing for hearing on sale of properties and conference with J. Rolls and P. Lewis regarding same and communicate with real estate broker regarding same (.50); conference with J. Rolls regarding new motion to approve sales of two properties (.25).	3.00
8/12/21	KMC	Prepare for hearing to approve sale of 6 properties and conference with J. Rolls and P. Lewis regarding same (1.00); telephone conference with CFTC regarding status of receivership (.50); review DISCO and gather information for preparing contempt motion against Defendants (1.00); review and revise motion to sell 2 additional properties and send to parties for purposes of conferencing (.50); gather information regarding commissions paid to David Bleeden and send to counsel for D. Bleeden with form for Sworn Statement of Financial Condition to determine whether D. Bleeden is interested in settling claim (1.00).	3.00
8/13/21	KMC	Prepare draft of email to send to attorney for Carlos Cruz and conference with P. Lewis regarding same (.75); communicate with Andrea Cook regarding letters to brokers (.25); telephone conference with C. Koonce regarding complaint against brokers (.25).	1.25
8/14/21	KMC	Work on Emergency Show Cause Motion against Defendants Asher and Simon and gather evidence in support of Motion.	4.00
8/16/21	KMC	Work on Emergency Show Cause Motion against Defendants Asher and Simon and gather evidence in support of Motion, including prepare draft of Declaration of Jeremiah McWright.	4.00
8/17/21	KMC	Telephone conference with CFTC regarding receivership assets under the Court orders (1.00); research database of documents regarding Lucas Asher's use of receivership assets (.50); listen to webinar given by L. Asher regarding his use and development of receivership assets (.25).	1.75
8/18/21	KMC	Communicate with broker regarding repairs that need to be made to Chew property (.25); conferences with P. Lewis and J. Rolls preparing for hearing to approve sale of 6 properties (2.50); have Receivership website updated with notice of hearing (.25); communicate with former employee of Retirement Insider and prepare and obtain declaration from former employee (1.25).	4.25

SCHEEF & STONE, LLP

Invoice: 109212

May 5, 2022

Date	Atty	Description	Hours
8/19/21	KMC	Prepare for and attend hearing to approve sale of 6 properties (1.50); telephone conference with CFTC regarding hearing (.50); have draft of Order sent to Judge Lindsay (.25); communicate with broker regarding approval of sale of properties and pay for trees to be trimmed at a property as required by lender (.25); conference with paralegal regarding property insurance (.25); conference with P. Lewis regarding motion to compel turnover of security deposits (.25); take additional photographs of jewelry turned over as requested by Fainche's attorney and communicate with P. Lewis regarding same (.25); communicate with J. Hacker and prepare declaration based on communications (.75); communicate with witness to activities of defendants regarding declaration and revise declaration (.75); telephone conferences with CFTC regarding status of receivership assets used by Defendants and Relief Defendant (1.00); conference with P. Lewis regarding violations of SRO by Carlos Cruz and response of attorney for Carlos Cruz and investigate relationship of Carlos Cruz to Defendants (.75).	5.25
8/20/21	KMC	Review draft of complaint against broker and telephone conference with C. Koonce regarding same (.75); telephone conference with paralegal regarding determining claim amounts for certain metals (.25).	1.00
8/23/21	KMC	Conference with P. Lewis regarding strategy with respect by Carlos Cruz to comply with SRO.	.25
8/24/21	KMC	Prepare letter to Downtown Porsche LA regarding custom Porsche ordered by Defendant (.50); obtain storage device from K. Loquette of images from computers and communicate with J. Stafford regarding same (1.00); work on declaration of former employee who worked for Defendants (.50); obtain Order authorizing sale of properties and send to title company and to broker for closing together with wire instructions (.25).	2.25
8/25/21	KMC	Revise and finalize and have filed Motion for Approval of Sale of Wanamaker Property, together with proposed Order, and Appendix (1.0); numerous communications with broker and with title company in preparation for closing on the sale of 6 properties (1.50); review research regarding scope of "acting in participation or concert with defendants" (.25); communicate with former employee of defendant regarding declaration (.25).	3.00
8/26/21	KMC	Communicate with broker regarding repairs to properties to be sold (.25); secure and pay property insurance premium for 17 Philadelphia homes (.25); review, revise, and execute Engagement Agreement for Kentucky law firm to file Notice of Stay in pending litigation against receivership entities in Kentucky (.25).	.75
8/27/21	KMC	Review and execute 6 deeds for sale of Philadelphia properties and send to title company with letter to keep deeds in escrow until closing (.50); send letter to East West Bank for deposit of proceeds from equity investment (.25); prepare letter to US Bank regarding additional entities added to receivership to determine if accounts exist (.50).	1.25

SCHEEF & STONE, LLP

Invoice: 109212

May 5, 2022

Date	Atty	Description	Hours
8/30/21	KMC	Telephone conference with CFTC regarding potential contempt motion and facts regarding such contempt (1.00); work on contempt motion and gather facts in support of motion (2.25); receive letter from G. Besen regarding Asher providing answers as required by the Court and prepare responsive letter and send to P. Lewis for review (.75); numerous communications with broker and execute Contract Amendments in preparation for closing of sale of properties in Philadelphia (.50).	4.50
8/31/21	KMC	Revise and finalize letter to Gene Besen (.25); work on Declaration in support of Emergency Contempt Motion against Asher and Simon (1.50).	1.75
9/01/21	KMC	Continue work on declaration in support of contempt motion and gather documents to include as exhibits to declaration (3.00);	4.00
9/02/21	KMC	Work on broker complaint (1.50); attend to properties, pay invoices, and communicate with broker (.25); telephone conference with accounting firm regarding monies paid to consultants to assist with Portfolio Insider (.25); telephone conference with CFTC regarding information for contempt Motion (.25); prepare email to A. Spencer regarding him continuing to be the attorney of record for the Defendants (.25); conference with D. Wills regarding letters to tax entities (.25); conference with P. Lewis regarding Portfolio Insider (.50).	3.25
9/06/21	KMC	Prepare Receiver's Fifth Status Report	2.50
9/07/21	KMC	Telephone conference with CFTC regarding contempt motion (.50); communicate with P. Lewis regarding call with Intrinio attorney and communications with attorney for David Bleeden (.25); communicate with broker regarding offers to purchase Chew property and with title company regarding closings (.25); review and revise draft of contempt motion (.25).	1.50
9/08/21	KMC	Work on broker complaint and communications with A. Cook and with C. Koonce regarding same (1.00); work on Status report (.50); communicate with P. Lewis regarding settlement discussions with attorney for David Bleeden (.25); communicate with CFTC regarding information gathered to support contempt motion (.25); communicate with investor regarding tax issues related to claim (.25).	2.25
9/09/21	KMC	Telephone conferences with counsel for PayPal regarding production of records (.50); communicate with parties regarding Motion to Sell Rosemar property and prepare Motion for filing with the Court (.50); revise and finalize Receiver's Fifth Status Report for filing with the Court (.25); communicate with A. Cook and with C. Koonce regarding Broker Complaint (.50); communicate with Alabama securities division regarding information to support contempt motion and communicate with CFTC regarding same (.25).	2.00

SCHEEF & STONE, LLP

Invoice: 109212

May 5, 2022

Date	Atty	Description	Hours
9/10/21	KMC	Review and execute closing documents for sale of two properties in Philadelphia (.75); telephone conference with Kelly (.25); finalize and file Receiver's Fifth Status Report (.50); work on Broker's Complaint and schedules that are exhibits to Broker's Complaint and communicate with C. Koonce regarding same (1.50); work on obtaining and downloading PayPal records (.25); review Receiver's Fifth Fee Application and send to parties for certificate of conference (no charge).	3.00
9/12/21	KMC	Review and revise Broker complaint.	3.00
9/13/21	KMC	Revise and finalize Broker's Complaint and have filed (5.00); telephone conference with CFTC regarding receivership issues (.50); revise draft of Emergency Motion for Contempt (1.00); communicate with broker regarding contracts for the sale of properties, execute closing documents, and execute termination of contract for Wanamaker property (.50).	7.00
9/14/21	KMC	Telephone conference with CFTC (2.75); communicate with broker regarding pending real estate issues (.25); communicate with paralegal regarding potential objection of investor to claims recommendation (.25); work on Emergency Motion for Show Cause Hearing to Hold Defendants Asher and Batasvhili in Civil Contempt (1.25); communicate with J. Rolls regarding Notice of Withdrawal of Motion to Approve sale of Wanamaker property because contract was terminated by buyer and review same prior to it being filed with the Court (.25).	4.75
9/15/21	KMC	Work on Emergency Motion for Show Cause Hearing to Hold Defendants Asher and Batashvili in Civil Contempt, Appendix in Support, and proposed Order.	11.00
9/16/21	KMC	Conference with P. Lewis regarding filing of Motion for Contempt and conferring with opposing counsel (.50); telephone conferences with CFTC regarding Motion for Contempt (.50); revise and finalize Motion for Contempt and review Appendix in Support of Motion for Contempt (2.00); communicate with broker regarding closing of sale of property and storm hazard declaration (.25); conference with C. Koonce regarding filing lawsuit against C. Cruz to recover fraudulent transfers and issues associated with same (.50).	3.75
9/20/21	KMC	Telephone conference with CFTC regarding receivership issues (.50); telephone conference with CFTC and Pipedrive regarding preserving records (.50); prepare letter to Pipedrive regarding turnover of records (.50); prepare Certificate of Interested Persons in broker lawsuit (.25); work on gathering information regarding MagicStar Arrow and Carlos Cruz and conference with accountant and P. Lewis (1.75).	3.25

SCHEEF & STONE, LLP

Invoice: 109212

May 5, 2022

Date	Atty	Description	Hours
9/21/21	KMC	Revise and finalize Certificate of Interested Persons and have filed with the Court in broker case (.50); telephone conference with C. Koonce regarding call from attorney representing Walter Vera about lawsuit and Portfolio Insider (.25); research files to gather information regarding payments to MagicStar Arrow and multiple telephone conferences with accounting firm regarding same (1.00); research files regarding Perez Batashvili and conference with paralegal regarding same (.50); receive and review letter from Gene Besen providing information Defendant Asher promised to provide and respond to same (.25); conference with P. Lewis regarding his call to Besen (.25); revise deposition notice for Carlos Cruz and communicate with Plaintiffs regarding date for deposition (.50); conference with CFTC regarding contempt motion and hearing of same (.25); conference with P. Lewis and team regarding strategy for hearing on contempt motion and prepare outline for hearing (1.00); conference with J. Stafford regarding status of Jones Day production of documents (.25); communicate with Utah securities attorney providing her with list of Utah claimants (.25).	5.00
9/22/21	KMC	Conference with P. Lewis regarding obtaining hearing date for contempt motion and conference with CFTC regarding same (.50); review and revise email to attorney for Carlos Cruz and communicate with P. Lewis regarding same (.25); review and revise Notice of Deposition of Carlos Cruz (.25); review and revise subpoena for deposition of Carlos Cruz (.25); finalize and file with the Court supplemental response to notice by Defendant Asher regarding Information to provide to the Receiver (.25); finalize Fifth Fee Application, Appendix, and Order and have filed with the Court (1.50 NO CHARGE); communicate with broker regarding repairs to property and selling Rhawn property without permits being cleared (.25).	1.75
9/23/21	KMC	Receive Order from Court setting hearing date and conference with P. Lewis regarding same (.50); conference with P. Lewis regarding Notice of Deposition of Carlos Cruz and subpoena and service of same on parties (.50); review and approve summons for submission to court in broker lawsuit (.25); communicate with Cort Thomas regarding BOA contempt motion and prospect for settlement (.25); conference with paralegal regarding chart of transfers to MagicStar Arrow and communicate with Andrea regarding preparing draft complaint against MagicStar Arrow (.75).	2.25
9/24/21	KMC	Telephone conference with CFTC regarding Portfolio Insider (.25); conference with P. Lewis regarding same and regarding hiring private investigator to see if assets moved out of Portfolio Insider office (.25); prepare letter to owner of office building where Portfolio Insider has its space to preserve video footage of the building (.50); communicate with broker regarding approving new contract for Wanamaker house (.25).	1.25
9/26/21	KMC	Gather information and provide to accountants to prepare and file receivership tax return and respond to questions from accountants.	1.00

SCHEEF & STONE, LLP

Invoice: 109212

May 5, 2022

Date	Atty	Description	Hours
9/28/21	KMC	Prepare subpoena for information to be turned over by property owner of building occupied by Defendants (.50); telephone conferences with owner of property where Defendants are working (.25); conference with J. Stafford and computer consultant about retrieving information (.50); telephone conference with attorney for witness regarding Portfolio Insider (.50); telephone conference with CFTC regarding Portfolio Insider (.50); review and execute agreement to hire consultant to image computers (.25).	2.00
9/29/21	KMC	Receive and review documents produced by MagicStar Entertainment (.75); communicate with A. Spencer regarding his conference on motion to withdraw and review local rules regarding withdrawal as counsel (.50); telephone conference with C. Koonce regarding call from attorney representing broker (.25); conference with P. Lewis regarding call from attorney representing Bleeden (.25); telephone conference with owner of Beverly Building regarding payment of invoice (.25); telephone conference with Kelly regarding turnover of computers (.25); telephone conference with attorney for Portfolio Insider employee (.25); conferences with CFTC regarding receivership issues (.50); communicate with broker regarding repair credit for sale of Rhawn property because permits have not been issued and violations cured (.25).	3.25
9/30/21	KMC	Communicate with paralegal regarding objections to claims report (.25); communicate with broker regarding Rhawn Street property repairs and extension for closing date (.25); telephone conference with CFTC regarding evidence in support of Motion for Contempt against Asher and Batashvili (.50); communicate with general counsel of Pipedrive regarding production of documents (.25).	1.25
10/04/21	KMC	Telephone conference with Pipedrive regarding production of documents (.25); prepare draft of letter requesting production of documents by third party for show cause hearing (.50); conference with A. Cook regarding draft complaint against Carlos Cruz (.25); review and execute amendment to Rhawn Street contract for buyer to take care of outstanding code violations (.25); receive and review offer for purchase of another Philadelphia property and execute contract for sale of same (.25); review offer for sale of package of five properties, communicate with associate regarding appraised values of properties, and make counter-offer for sale of properties (.25); conference with paralegal regarding objections to claims and submission of late filed claim (.25).	2.00
10/05/21	KMC	Revise and finalize letter to attorney for third party requesting production of documents to prepare for hearing and contempt motion and send to attorney (.50); conference with D. Wills regarding letters to taxing authorities in response to tax assessments, revise letters, and finalize for sending to taxing authorities (.50); review production from Carlos Cruz regarding MagicStar and have paralegal compare invoices to payments and send production to CFTC (.75); communicate with P. Lewis regarding call from attorney for David Bleeden and Randall Kohl to discuss settlement of broker lawsuit (.25).	2.00

SCHEEF & STONE, LLP

Invoice: 109212

May 5, 2022

Date	Atty	Description	Hours
10/06/21	KMC	Telephone conference with CFTC regarding Order from court postponing hearing and staying proceedings, and preparation for hearing on show cause motion (.75); execute agreement for structural engineer to review joists at Rhawn Street for closing and send check and communicate with broker regarding same (.25); negotiate with broker sale of 5 of Philadelphia properties in a package deal (.25); review and execute contract for sale of additional Philadelphia property (.25); conference with P. Lewis regarding call with attorney for Bleeden and Kohl regarding settlement (.25); conference with A. Cook regarding complaint against Carlos Cruz/MagicStar Arrow (.25).	2.00
10/07/21	KMC	Telephone conference with CFTC regarding evidence for hearing (.50); conference with P. Lewis regarding Stay Order issued by court and conversation with Court clerk regarding scope of Stay Order (.50); communicate with counsel for Pipedrive regarding Stay Order and confer with P. Lewis regarding same (.25)	1.25
10/08/21	KMC	Receive and review response to Motion for Contempt filed by Defendants Asher and Batashvili and conference with P. Lewis regarding same (.25); receive and review Motion for Leave filed by Portfolio Insider and conference with P. Lewis, and CFTC regarding same (.75).	1.00
10/11/21	KMC	Review contract for sale of 5 properties and communicate with broker regarding same (.25); prepare draft of Response to Motion for Leave and conference with P. Lewis regarding same (1.00); communicate with P. Lewis regarding settlement talks with attorney for Bleeden and Kohl (.25).	1.50
10/12/21	KMC	Telephone conferences with CFTC regarding evidence in support of Motions in preparation for hearing (1.00); investigate deposits into Barrick Capital account after receivership in response to claim of investor and communicate with paralegal regarding same (.50); telephone conference with Pipedrive as requested by Pipedrive (.25); telephone conference with former PI employee providing evidence in support of motion filed by Receiver and conference with P. Lewis regarding same (1.00); receive Order from Court staying activities of parties and Receiver until hearing on pending motions and conference with P. Lewis regarding same (.50); telephone conference with CFTC regarding Order (.50); telephone conference with C. Koonce regarding stay Order and status of broker lawsuit (.25).	4.00
10/14/21	KMC	Telephone conference with CFTC regarding stay order and pending motions.	.50
10/15/21	KMC	Conference with P. Lewis regarding court approval to sign closing documents for sale of Rhawn property and execute documents to sell Rhawn property.	.50
10/18/21	KMC	Work on Reply to Defendant's Opposition to Contempt Motion.	2.50
10/19/21	KMC	Work on Reply to Defendants' Opposition to Receiver's Motion for Contempt and review Motion filed by Portfolio Insider.	4.00
10/20/21	KMC	Work on Reply and begin working on Response to Motion filed by Cruz; conference with P. Lewis regarding same; conference with CFTC regarding same.	4.00

SCHEEF & STONE, LLP

Invoice: 109212

May 5, 2022

Date	Atty	Description	Hours
10/21/21	KMC	Revise and finalize Reply to Defendants' Opposition to Receiver's Emergency Motion for Show Cause Hearing to Hold Defendants Lucas Asher and Simon Batashvili in Contempt, have filed with the Court, and conferences with P. Lewis regarding same.	4.00
10/22/21	KMC	Work on Response to Portfolio Insider's Motion and conference with D. Wills regarding legal research in support of Response.	.50
10/24/21	KMC	Work on Response to Portfolio Insider's Motion to Prevent Receiver from Taking Possession of Property of a Non-Receivership Entity.	4.00
10/25/21	KMC	Continue working on Response to Portfolio Insider Motion to Prevent Receiver from Taking Possession of Property of a Non-Receivership Entity and prepare Declaration in Support of Response.	8.00
10/26/21	KMC	Review, revise and finalize Response to Portfolio Insider Motion and have filed with the Court (2.50); prepare, revise, and finalize Appendix in Support of Response to Portfolio Insider Motion and have file with the Court (1.50).	4.00
11/02/21	KMC	Review Reply filed by Portfolio Insider to Response of Receiver to Portfolio Insider Motion.	.25
11/03/21	KMC	Conference with P. Lewis regarding preparation for hearing on pending motions.	1.00
11/04/21	KMC	Telephone conference with CFTC regarding preparing for hearing on motions.	.25
11/08/21	KMC	Communicate with attorney for witness regarding hearing on pending motions and execute document required to receive shares from equity distribution on behalf of receivership.	.25
11/18/21	KMC	Telephone conference with CFTC regarding strategy for hearing on pending motions (.75); conference with P. Lewis regarding strategy for hearing on pending motions (.50).	1.25
12/01/21	KMC	Telephone conference with C. Koonce regarding filing motion to extend deadline for expiration of subpoenas to brokers and conference with P. Lewis regarding same.	.50
12/02/21	KMC	Conference with P. Lewis regarding filing motion in broker lawsuit to extend timeliness of summons; communicate with C. Koonce regarding same.	.25
12/07/21	KMC	Conference with P. Lewis regarding seeking leave to close on sale of properties; review motion for leave to file motion for extension.	.25
12/08/21	KMC	Review proposed motion for leave to extend deadline for serving summons in Crawford v. Bleeden lawsuit.	.25
12/10/21	KMC	Conference with CFTC and with IT experts regarding harddrives in preparation for hearing.	.25

SCHEEF & STONE, LLP

Invoice: 109212

May 5, 2022

Date	Atty	Description	Hours
12/16/21	KMC	Telephone conference with Kelly L. regarding status of information provided; telephone conference with CFTC regarding same; review and revise proposed motion for leave to file motions seeking approval of the sale of real properties remaining in receivership and communicate with P. Lewis regarding same.	1.00
12/20/21	KMC	Review information from broker regarding prospective sales of real estate in Philadelphia and conference with P. Lewis regarding filing motion for leave to obtain order allowing sales of properties to go forward.	.25
12/21/21	KMC	Work on Receiver's Claims Objection Report.	.50
12/22/21	KMC	Work on Receiver's Response to Objections to Claims Report (2.00); revise and finalize Motion for Leave to file Motion to Approve Appraisers and Sales of Property (.25).	2.25
12/27/21	KMC	Work on Receiver's Report Regarding Objections to Claims Report and conference with D. Wills regarding legal research to include in Receiver's Report.	4.00
12/28/21	KMC	Research regarding priority of investors over creditors for distribution to include in Report Regarding Objections to Claims Report and communicate with paralegal regarding Report (.50); communicate with paralegal regarding entry of appearance by attorney for investor whose money was deposited after receivership and included in monies turned over to receiver (.25).	.75
12/29/21	KMC	Review legal research regarding priority of investors over creditors in receivership distributions and add string cite of authorities to Receiver's Report Regarding Objections to Claims Report (0.75); review proposed Order from attorney for investor who wants monies released from receivership that were deposited after freeze order and communicate with attorney regarding same (.50).	1.25
1/10/22	KMC	Telephone conference with J. Stafford regarding Montana Consent Decree; review and execute Montana Consent Decree.	.25
1/11/22	KMC	Receive distributions from sale of real property interests and prepare letter to bank for deposit of monies in receivership account.	.25
1/12/22	KMC	Communicate with J. Stafford regarding turnover of hard drive to be examined by CFTC	.25
1/13/22	KMC	Coordinate having hard drives sent to CFTC for viewing.	.25
1/20/22	KMC	Conference with Peter Lewis regarding stay of proceedings and preparing for hearing; communicate with broker regarding person interested in purchasing one of the Philadelphia properties.	.50
1/24/22	KMC	Telephone conference with CFTC regarding Montana Consent Judgment and status of receivership; prepare and send email to CFTC attaching Consent Judgment and explaining that reference to restitution is from Montana state monies and not from receivership monies.	.50

SCHEEF & STONE, LLP

Invoice: 109212

May 5, 2022

Date	Atty	Description	Hours
1/26/22	KMC	Communicate with attorney for investor regarding non-opposition to order for return of investor funds that were deposited with Wells Fargo after freeze order; telephone conference with CFTC regarding same and send bank record and email to CFTC regarding same.	.50
1/28/22	KMC	Pay insurance, water, and electricity bills for Philadelphia properties.	.25
2/01/22	KMC	Communicate with investors regarding status of receivership.	.25
2/04/22	KMC	Telephone conference with investor complaining about delay in proceedings; communicate with broker regarding having locks changed on Philadelphia property because of squatter.	.25
2/07/22	KMC	Listen to voicemail from [REDACTED] regarding fraudulent activities of defendants and communicate with P. Lewis regarding stay in case.	.25
2/09/22	KMC	Receive numerous calls and emails from investors regarding status of receivership and respond to some and confer with attorneys and paralegal regarding responding to others; communicate with Iowa Securities Department regarding Iowa investor.	.50
2/10/22	KMC	Review Court's sua sponte dismissal of Bleeden lawsuit and review opinion and judgment regarding same (.50); conference with CFTC regarding same (.50); conference with C. Koonce regarding same (.25); conference with P. Lewis regarding same (.25); prepare letter to investors regarding stay (.25).	1.75
2/11/22	KMC	Review opinion from Court dismissing broker lawsuit and work on strategy for response, with review of initial case law in support of vacating the judgment.	.50
2/13/22	KMC	Begin work on Motion for New Trial and begin research of cases in support of vacating judgment.	2.00
2/14/22	KMC	Conference with P. Lewis regarding Motion for New Trial(.50); conference with C. Koonce regarding Motion for New Trial (.25); telephone conference with JonMarc Buffa regarding Motion for New Trial (.25); finalize letter to send to investors regarding stay of receivership in response to numerous calls (.25).	1.25
2/15/22	KMC	Work on Motion for New Trial, including review of issues prepared by P. Lewis and communications with C. Koonce regarding same.	1.00
2/16/22	KMC	Communicate with C. Koonce regarding Motion for New Trial.	.25
2/17/22	KMC	Work on Motion for New Trial.	3.00
2/18/22	KMC	Communicate with investors regarding status of receivership (.25); conference with CFTC regarding motion for new trial (.50); conference with C. Koonce regarding motion for new trial (.25); work on Motion for New Trial (.50); telephone conference with Utah Securities Department about its claim against brokers (.25).	1.75
2/19/22	KMC	Work on Motion for New Trial.	5.00

SCHEEF & STONE, LLP

Invoice: 109212

May 5, 2022

Date	Atty	Description	Hours
2/21/22	KMC	Work on Motion for New Trial.	3.50
2/22/22	KMC	Communicate with C. Koonce regarding motion for new trial.	.25
2/22/22	KMC	Prepare Protest to franchise tax assessment by State of California against Barrick Capital.	.50
2/23/22	KMC	Conference with P. Lewis regarding Motion for New Trial and work on Motion for New Trial.	1.00
2/24/22	KMC	Revise Motion for New Trial and send to P. Lewis and C. Koonce for review (1.50); conference with P. Lewis regarding Motion for New Trial (.50); telephone conference with Plaintiffs regarding Motion for New Trial (1.00).	3.00
2/25/22	KMC	Telephone conference with C. Koonce regarding Motion for New Trial (.25).	.25
2/28/22	KMC	Communicate with East West Bank regarding diversifying deposits, review documents making such diversification for FDIC purposes, and conference with associate regarding review (.75); conference with P. Lewis regarding Motion for New Trial (.75); legal research in support of Motion for New Trial (1.50).	3.00
3/01/22	KMC	Conference with P. Lewis regarding Motion for New Trial.	.50
3/01/22	KMC	Conference with associate regarding review of ICS agreement to allocate monies on deposit in receivership account to various banks to obtain FDIC protection of funds, and execute agreements with East West Bank regarding same.	.75
3/03/22	KMC	Legal research for Motion for New Trial and continue drafting Motion for New Trial.	3.00
3/04/22	KMC	Work on Motion for New Trial.	4.50
3/05/22	KMC	Work on Motion for New Trial.	3.00
3/07/22	KMC	Work on Motion for New Trial.	6.00
3/08/22	KMC	Finalize Motion for New Trial and file with the Court.	2.50
3/17/22	KMC	Pay bills of receivership to insure assets and pay utilities for properties; communicate with real estate broker regarding status of stay of case.	.25
4/18/22	KMC	Communicate with accountants to confirm filing of extension for tax returns for receivership; pay bills for Philadelphia properties in receivership; conference with C. Thomas regarding whether entities were ever ordered to retain counsel in receivership.	1.00
4/19/22	KMC	Receive Order granting Motion for Leave to file Motion to seek authority to sell Philadelphia properties and prepare Notice to the Court regarding offers being withdrawn in light of the stay.	.75

SCHEEF & STONE, LLP

Invoice: 109212

May 5, 2022

Date	Atty	Description	Hours
4/20/22	KMC	Review, finalize, and file Notice regarding Motion for Leave to seek approval to sell properties in Philadelphia (.25); communicate with C. Thomas regarding BOA's attorney accepting service of show cause order and filing notice with court regarding service (.25); receive and review show cause order as to Defendants, docket same, and confer with P. Lewis regarding same (.25); communicate with broker regarding Rosemar property contract and order for hearing to approve sale of property (.25).	1.00
4/21/22	KMC	Review and revise publication of notice of sale of property and conference with paralegal regarding publication of notice.	.25
4/25/22	KMC	Conference with P. Lewis regarding pending motions and regarding request for counsel for defendants to have additional time to file response to show cause order.	.25
4/27/22	KMC	Pay utility bills of Philadelphia properties and communicate with broker regarding squatter being in one of the properties; communicate with paralegal regarding terminating electrical service to property with squatter; review 60 day status report required by federal court in California in lawsuit against receivership entities.	.50
4/28/22	KMC	Telephone conference with attorney for S. Austin regarding return of monies deposited after receivership was in place and form of order (.25); calculate interest earned on monies since deposited with receivership account and provide to attorney for S. Austin (.25); telephone conference with Philadelphia broker and P. Lewis regarding status of remaining properties to sell and issue with squatter (.50).	1.00
4/29/22	KMC	Conference with P. Lewis regarding withdrawal of counsel for Portfolio Insider and strategy in light of same (.25); receive Order from court to make payment to Stephen Austin for monies deposited after receivership began, issue check to same, and prepare letter to attorney for Stephen Austin regarding same (.25); telephone conference with IRS Chief Counsel office regarding tax liability of Chase Metals and communicate with Kelly regarding same and provide IRS with Form 56 for receivership (.50).	1.00

TOTAL PROFESSIONAL SERVICES

\$ 102,277.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
Kelly M. Crawford	262.25	390.00	102,277.50
Total	262.25		\$ 102,277.50

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

PROFESSIONAL SERVICES

Date	Atty	Description	Hours
7/26/21	JLR	Research and contact the Clerk of the Court for Bullitt County, Kentucky to ascertain the procedures for filing out-of-state Notice of Receivership and Related Stay in the state circuit court.	.50
7/26/21	JLR	Receipt of and listen to voicemail from Investor Victim, D. Davenport, regarding claim of potential contact with Receivership Defendants.	.25
7/26/21	JLR	Receipt and review of email correspondence from K. Crawford regarding request for copy of Affidavit of Publication for March 2021 national Public Notice in USA Today.	.25
7/26/21	JLR	Draft and send summary email to Receiver, K. Crawford, providing fact recap of telephone call with Investor Victim, D. Davenport, regarding claim of potential contact with Receivership Defendants or prior Receivership Defendants' employees/salesman.	.25
7/26/21	JLR	Follow-up telephone call to USA Today contact, T. Hagerich, requesting copy of Affidavit of Publication as to March 2021 Public Notice of Receivership claim bar date.	.25
7/26/21	JLR	Prepare exhibits for Notice of Receivership and Related Stay for the three (3) pending Kentucky state court cases involving the Receivership Defendants.	.50
7/26/21	JLR	Incorporate revisions of J. Stafford into Notice of Receivership and Related Stay in Commonwealth of Kentucky Case styled Bill Cravens et al. v. TMTE Inc., dba Metals.com et al. involving Receivership Defendants.	1.25
7/26/21	JLR	Receipt of and listen to voicemail from Investor Victim, C. Harney, regarding Receivership claim and tax question related to the same.	.25
7/26/21	JLR	Telephone call with Investor Victim, D. Davenport regarding claim of potential contact with Receivership Defendants or prior Receivership Defendants' employees/salesman; Take notes regarding her allegations of the same.	.75
7/26/21	JLR	Revise exhibits for Notice of Receivership and Related Stay for the three (3) pending Kentucky state court cases involving Receivership Defendants; Revise to include additional Docket Entry/Court Order of additional entities.	.50
7/26/21	JLR	Telephone call with Investor Victim, C. Harney, to provide status update and address questions over tax issues as to her Receivership claim.	.25
7/26/21	JLR	Draft and send email to USA Today contact, T. Hagerich, requesting copy of Affidavit of Publication as to March 2021 Public Notice of Receivership claim bar date.	.25
7/26/21	CAM	Continue working on claim calculation forms, including revisions, research, phone calls/emails etc. to accurately complete claim calculation forms.	7.50
7/26/21	JSS	Review and revise Montana consent order in light of edits from Receiver.	.25



SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
7/26/21	JSS	Communications with CFTC regarding production of documents.	.25
7/26/21	JSS	E-mail and telephonic communications with expert IT regarding production of documents to CFTC.	.25
7/26/21	AE	Review, revise, finalize, and process claims and send out claims to investors.	8.00
7/26/21	PCL	Communications with K. Crawford and S. Thomas regarding reply to documents Thomas stated he was going to deliver	.30
7/27/21	JLR	Attend meeting with K. Crawford and G. Besen regarding the turnover of Receivership Defendants' assets.	.50
7/27/21	JLR	Draft and send email to Plaintiff's Counsel in Bullitt County, KY state court providing the attached Notice of Receivership and Related Stay.	.50
7/27/21	JLR	Draft and send responsive email to USA Today contact, T. Hagerich, to confirm receipt of the tear sheet and Affidavit of Publication for the March 2021 Receivership national Public Notice.	.25
7/27/21	JLR	Draft and send email correspondence to Counsel for Defendant New Direction in Bullitt County, KY state court providing the attached Notice of Receivership and Related Stay.	.25
7/27/21	JLR	Answer the return call of Investor Victim, M. Lalick, regarding Receivership status update and whether he can sell/transfer his remaining metals from the current custodian.	.25
7/27/21	JLR	Draft and send responsive email to Investor Victim, M. Lalick, providing summary of telephone call and Receivership status for his wife's reading and records.	.25
7/27/21	JLR	Return the call of Investor Victim, T. Morin, to provide status update as to the Receivership and his claim.	.25
7/27/21	JLR	Interoffice conference with C. Morris regarding outstanding claim calculations as to Investor Victim, J. Raganswood, as to receipt of her metals.	.50
7/27/21	JLR	Receipt of and listen to voicemail from Investor Victim, R. Reisner, regarding the Claim Report.	.25
7/27/21	JLR	Receipt of and listen to voicemail from Investor Victim, D. Davenport, providing additional supporting information regarding her interactions with individuals akin to the Receivership Defendants.	.25
7/27/21	JLR	Telephone calls with various clerks of Bullitt County, KY to address filing of the Notice of Receivership and Related Stay for a pending cause in the circuit court of Bullitt County.	.50
7/27/21	JLR	Return the call of Investor Victim, R. Reisner, regarding no receipt of her Claim Report; Inform here that such information will not be mailed until 7/30.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
7/27/21	JLR	Prepare the Notice of Receivership and Related Stay for Special Delivery necessary to filing the same via mail in accordance with the local rules of Bullitt County, KY.	.25
7/27/21	CAM	Continue working on claim calculation forms, including revisions, research, phone calls/emails etc. to accurately complete claim calculation forms.	7.50
7/27/21	AE	Review, revise, finalize, and process claims and send out claims to investors.	8.00
7/27/21	PCL	Communications with K. Crawford regarding turnover of watches by G. Besen(.3); review of notice of no objection regarding fee app and related communications with K. Crawford(.2);communications with G. Besen and K. Crawford regarding additional retainer source information(.3).	.80
7/28/21	JLR	Answer telephone call from Investor Victim, K. Weigel, in response to my voicemail; Provide status update as to his claim in the Receivership.	.25
7/28/21	JLR	Receipt of and listen to voicemail from Investor, E. Cabacungan, requesting a status update as to her claim in the Receivership.	.25
7/28/21	JLR	Receipt and review of email from Investor Victim, K. Weigel, requesting status update as to the Receivership.	.25
7/28/21	JLR	Receipt of and listen to voicemail from Investor Victim, C. Wright, requesting a status update as to the Receivership.	.25
7/28/21	JLR	Draft and send responsive email to Investor Victim, K. Weigel, providing a timeline of upcoming Receivership actions and deadlines in response to his request for a status update.	.25
7/28/21	JLR	Return the call of Investor Victim, C. Wright, to provide status update as to her Receivership claim and address issue as to the sale of her remaining metals; Confer with K. Crawford regarding the same.	.50
7/28/21	JLR	Draft and send email correspondence to Investor Victim, E. Cabacungan, providing a timeline of upcoming Receivership dates and deadlines as a status update for the Receivership.	.25
7/28/21	CAM	Finalize claim calculation forms for investors and prepare exhibit of all allowed claims for Receiver's Claims Report (7.5).	7.50
7/28/21	AE	Review, revise, finalize, and process claims and send out claims to investors.	6.75
7/28/21	PCL	Communications with K. Crawford regarding Jewelry issues.	.10
7/29/21	JLR	Answer the call of Investor Victim, R. Rhyne, requesting status update as to his claim in the Receivership.	.25
7/29/21	JLR	Receipt and review of voicemail from Investor Victim, D. Davenport, regarding concerns over receipt of similar communications with the Receivership Defendants as to the sale of precious metals.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
7/29/21	JLR	Receipt and review of subsequent email from Investor Victim, L. Lalik, regarding liquidation of remaining metals from New Direction.	.25
7/29/21	JLR	Draft and send responsive email to Investor Victim, K. Weigel, regarding the mailing of the Claim Report and respective information.	.25
7/29/21	JLR	Telephone call with Investor Victim, J. Raganswood, regarding need to understand/confirm receipt of metals to the Delaware Depository necessary for Receivership Claim.	.50
7/29/21	JLR	Receipt and review of email correspondence from Investor Victim, K. Weigel, in response to prior Receivership timeline and status email.	.25
7/29/21	JLR	Return the call of Investor Victim, D. Davenport, regarding concerns over receipt of similar communications with the Receivership Defendants as to the sale of precious metals.	.25
7/29/21	CAM	Prepare all investor claims to be mailed out and overseeing the mailout process (6).	6.00
7/29/21	AE	Review, revise, finalize, and process claims and send out claims to investors.	6.00
7/29/21	PCL	Communications with K. Crawford and G. Besen regarding failure to comply with Judge Tolliver order(.3); communications with K. Crawford, J. McClay, D. Baer regarding Jackson Street property(.2);communications with A. Spencer regarding alleged compliance with Asher production/disclosure obligations(.6).	1.10
7/30/21	JLR	Answer call from Investor Victim, C. Harris, requesting status update for his and his wife's respective Receivership Claims; Discuss the Claim Report mailing.	.25
7/30/21	JLR	Return the call of Investor Victim, G. Scott, regarding Receivership status update and explain the Receivership.	.25
7/30/21	JLR	Notified by Clerk of Bullitt County Circuit Court KY, of delivery issue with the filing, Notice of Receivership and Related Stay, in a pending matter in Circuit Court in Bullitt County, KY involving Receivership Defendants.	.25
7/30/21	JLR	Return the call of Investor Victim, D. Davenport, as scheduled for today 7/30 regarding her concerns over recent communications with individuals that sound like the Receivership Defendants; Listen to her concerns.	.50
7/30/21	CAM	Final quality check of all investor claims to be delivered to the post office and overseeing the final mail out process.	6.00
7/30/21	AE	Review, revise, finalize, and process claims and send out claims to investors.	6.00
7/30/21	PCL	Communications with K. Crawford regarding A. Spencer 7/29/ letter(.3);communications with J. Buffa, R. Foelber and K. Crawford regarding claims package(.4) communications with S. Thomas and K. Crawford regarding C. Cruz/MagicStar document request(.4)communications with G. Besen and L. Devaney regarding retainer background, C. Cruz connections(.6).	1.70

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
8/02/21	JLR	Draft and send responsive email to Investor Victim J. Ihrke, notifying him that the Claim Report was mailed on 7/30.	.25
8/02/21	CAM	Review emails and phone calls from investors and respond to all and prepare memo to file regarding same (3); begin work of preparing claims value spreadsheet in anticipation of future interim distribution (3); download and complete application for gas service to be established 404 N. Wanamaker St. in Philadelphia and follow-up with additional documentation requested (.5).	6.50
8/02/21	PCL	Communications with K. Crawford, D. Baer, J. MacClay regarding Penn street, utilities, Wannamaker.	.20
8/02/21	AS	Catalogued broker commissions on excel.	2.00
8/03/21	CAM	Receive and review voicemails from investors requesting status of case and returning calls accordingly (1.2); respond to various emails from investors seeking assistance with their claims and status of the case (.8); work on claims value database post-claims mail out and begin process of preparing for future processes (4).	6.00
8/03/21	PCL	Communications with K. Crawford regarding status of hearings on pending motions, retainer related correspondence to Quinn Emanuel and Bradley Arant, et al(.4); draft/revise response to S. Thomas regarding C. Cruz/MagicStar document request(.6); communications with J. McWright and K. Crawford regarding case status(.3).	.90
8/03/21	AS	Obtain broker information for their subpoenas.	2.50
8/04/21	AEC	Conference with Kelly Crawford regarding demand letters to brokers; reviewed motion to extend deadlines establishing claims for adjudication process.	.60
8/04/21	JLR	Answer the call of Investor Victim, S. McCauley, to address his questions as to prior information exchanged, status update, and explain the Claim Report information he should be receiving shortly.	.25
8/04/21	JLR	Draft Receiver's Motion for Appointment of Appraisers, Approval of Appraisals of Certain One Additional Real Property, and Setting Hearing Regarding Approval of Sale as to the Wanamaker Property.	1.75
8/04/21	JLR	Draft Proposed Order granting Receiver's Motion for Appointment of Appraisers, Approval of Appraisals of Certain One Additional Real Property, and Setting Hearing Regarding Approval of Sale as to the Wanamaker Property.	.50
8/04/21	JLR	Draft Appendix in Support of Receiver's Motion for Appointment of Appraisers, Approval of Appraisals of Certain One Additional Real Property, and Setting Hearing Regarding Approval of Sale as to the Wanamaker Property.	1.00
8/04/21	CAM	Monitor receivership phone line and log in and return investor calls regarding various claim issues; memo to file regarding same (2.5); continue work on claims value database and begin process of removing investors who have not filed formal claims (2.5).	5.00

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
8/05/21	JLR	Receipt of and listen to multiple voicemails from Investor Victim, M. Strauss; Return the call of Investor Victim, M. Strauss, to discuss several points of confusion regarding her receipt and review of the information in the Claim Report mailing; Schedule follow-up call to address the same	.25
8/05/21	CAM	Receive and review email from investor J. Snider regarding his allowed claim value, and follow-up phone conversation requesting that his email be treated as a formal objection; print off all emails and attachments concerning Mr. Snider's claim and present to the Receiver as a formal objection and officially log in his objection and document file regarding same (1). Receive, review and respond to various other investor's calls/emails regarding claim values and provide answers and possible solutions to all; memo to file regarding same (1.5); finalize clean up of claims value database holding claims 900-1499 and bifurcate the claims based on source of payment (2.5); telephone call to Brager Tax Law and Cresa to determine if checks written to Tower/Lucas Asher are still valid and email to Receiver regarding same (.5).	5.50
8/05/21	PCL	Communications with K. Crawford regarding response to S. Thomas and drafting/revision of same.	1.50
8/06/21	CAM	Continue working on database to prepare for future distribution of funds (1.5); receive and return many calls from investors regarding their recommended allowed claim value; memo to file regarding same (4).	5.50
8/06/21	PCL	Communications with S. Thomas and K. Crawford regarding Cruz/MagicStar document request and related file review.	.40
8/09/21	CAM	Telephone call to Philadelphia Gas Works to finalize account for property on Wanamaker St.; email to Receiver regarding same (.5).	.50
8/09/21	CAM	T/c from many investors regarding claim packages received; return and document all calls, emails, revised claims and update call log and amended claims log.	4.50
8/09/21	PCL	Communications with S. Thomas and K. Crawford regarding Cruz/MagicStar document production request and/or related file review(.5); communications with K. Crawford and B. Given regarding jewelry reconciliation, transmission of related spreadsheets and related file review(1.0); communications with J. Buffa, K. Crawford and R. Foelber regarding Asher publicity spots(.8); communications with K. Crawford and A. Cook regarding broker demand letters and backup and/or related review of same(.60); communications with K. Crawford, J. McClay, D. Baer regarding Wannaker utility issues(.2).	3.10
8/10/21	PCL	Communications with K. Crawford, D. Baer, et al regarding Philadelphia properties(.3); communications with K. Crawford regarding S. Thomas/C.Cruz/MagicStar response to document production and related file review(.5); communications with B. Skupin and K. Crawford regarding Rule 65 research(.2); communications with K.Crawford regarding patent research(.2).	1.20
8/11/21	AEC	Conference with Receiver regarding letters to brokers.	.80

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
8/11/21	ABS	Research regarding application of receivership order to non-parties (4).	4.00
8/11/21	JLR	Revise Receiver's Motion for Appointment of Appraisers, Approval of Appraisals of Certain One Additional Real Property, and Setting Hearing Regarding Approval of Sale to incorporate the revisions of K. Crawford for seller's assist.	1.00
8/11/21	JLR	Receipt of and listen to multiple voicemails from Investor Victim, K. Randall, regarding questions as to receipt of his Claim Report Information; Telephone call with Investor Victim, K. Randall, to answer his questions regarding the Claim Report Information and explain the calculation of his total recommended claim and what that means in terms of recovery.	.50
8/11/21	JLR	Receipt and review of email correspondence from Investor Victim, M. Smith and his wife, K. Smith, detailing information in support of their contention that M. Smith's Investor Claim was wrongfully calculated and review additional attached documentation supporting substantially higher initial purchase Invoice with Barrick; Prepare and provide to C. Morris for additional review; Draft and send email notifying Investor Victim couple that we are reviewing the provided information and attachments and will be in touch regarding Investor Claim.	.50
8/11/21	JLR	Draft Proposed Order Granting Receiver's Notice of Receivership and Related Stay and Ordering Stay in B. Cravens et al. lawsuit in Bullet County, KY involving Receivership Defendants; Telephone call with the Bullet County Clerk's Office to correct prior filing via hardcopy mail; Incorporate said instructions from the Clerk; Contact the Kentucky Court of Appeals as the B. Cravens et al. lawsuit involving Receivership Defendants is pending appeal as to compel arbitration; Answer return call from the Clerk of the Kentucky Court of Appeals and discuss process to file Notice of Receivership and Related Stay; Interoffice email to locate local counsel as is required to file in the Kentucky Appellate Court.	2.25
8/11/21	JLR	Revise Receiver's Motion for Appointment of Appraisers, Approval of Appraisals of Certain One Additional Real Property, and Setting Hearing Regarding Approval of Sale to now incorporate second additional property (Rosemar); Revise Appendix to reflect the addition of the Rosemar property; Revise and re-prepare the exhibits to reflect the Rosemar contract and respective appraisals; Revise Order granting the same to reflect additional Rosemar Property.	2.25
8/11/21	JLR	Receipt of and listen to voicemail from Investor Victim, R. Reisner, requesting explanation as to the Claim Report information and if any action is required; Return the call of Investor Victim, R. Reisner, to explain that no action is required and explain the calculation of her total recommended claim value.	.25
8/11/21	JLR	Receipt of and listen to voicemail from Investor Victim, C. Richardson, requesting explanation as to the Claim Report information and confusion as to whether or not she had to complete and return something to the receiver; Return the call of same and explain the Claim Report information and explain that no action is required unless she elected to object to the total recommended claim value.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
8/11/21	JLR	Receipt of and listen to multiple voicemails from Investor Victim, T. Gallen, regarding confusion as to the Claim Report information, if the total recommended claim value was guaranteed to be received, and whether he had to send anything back; Return the call of the same to explain the Claim Report information, recovery of the total recommended claim value, and whether action was required.	.25
8/11/21	CAM	Receive and review numerous emails/phone calls regarding claims. Respond to each and every claim issue, update all databases and log sheets, generate amended claims when necessary, memo to file regarding same.	6.00
8/11/21	PCL	Communications with K.Crawford regarding Carlos Cruz(.3); communications with K.Crawford regarding contempt Asher and Batashvili new contempt motion (.6);communications with K. Crawford and B. Skupin regarding Carlos Cruz Rule 65 cases research and related review of same(.6);communications with D. Baer, J. McClay and K.Crawford regarding Wannamaker, et al., property issues(.4).	1.80
8/12/21	AEC	Draft 24 letters to brokers regarding fraudulent commissions.	1.50
8/12/21	JLR	Receipt and review of email correspondences between interoffice partner and referral attorney to potentially serve as local counsel in Kentucky as is required to file a Notice of Receivership and Related Stay in the Kentucky Court of Appeals for a pending case involving Receivership Defendants; Receipt and review of email correspondence back regarding unavailability to file as no experience with the Kentucky Court of Appeals; Draft and send responsive email seeking another potential referral.	.25
8/12/21	JLR	Prepare and provide list of outstanding individuals with pending Bayside Metals inclusive on contact issues and contact attempt details.	.50
8/12/21	JLR	Review of Receivership Investor Confirmation information to determine whether individuals with pending Bayside Metals filed a claim in the Receivership; Draft and send results of same to K. Crawford.	.50
8/12/21	JLR	Receipt and review of email correspondence from potential, now unavailable local counsel in Kentucky regarding referral of other local counsel; Telephone call to now referred local counsel, T. Sturgeon, requesting assistance with filing in Kentucky Court of Appeals as local counsel is required to file the Notice of Receivership and Related Stay.	.25
8/12/21	CAM	Receive numerous emails/phone calls regarding claims. Respond to each and every claim issue, update all databases and log sheets, generate amended claims when necessary, memo to file regarding same.	6.00
8/12/21	PCL	Communications with K.Crawford and J.Rolls regarding trial preparation for next week's hearing on motion to approve sale(.4); communications with K.Crawford, D. Baer, regarding Wanamaker property(.2); communications with A. Bernstein and K. Crawford regarding D. Bleeden(.3); communications with A. Spencer, J. Buffa, et al. regarding motion to sell tow additional Philadelphia properties and related review of same(.4).	1.10

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
8/13/21	AEC	Finalize and mail letters to brokers regarding fraudulent commissions and to provide notice of a possible lawsuit against them.	2.90
8/13/21	CAM	Receive numerous emails/phone calls regarding claims. Respond to each and every claim issue, update all databases and log sheets, generate amended claims when necessary, memo to file regarding same.	5.75
8/13/21	CAM	Telephone call to PGW to get meter installed in real property and follow-up email to receiver and realtor regarding same; calendar follow-up on same (.5).	.50
8/13/21	PCL	Communications with S. Thomas and K. Crawford regarding document request and related follow up with K.Crawford.	.40
8/15/21	PCL	Communications with A. Bernstein and K. Crawford regarding D.Bleeden.	.20
8/16/21	AEC	Reviewed letter from Jeremy Brown advising us that he no longer represents Ms. Hunter.	.20
8/16/21	AEC	Draft and mail new letter to Athena Hunter regarding fraudulent commissions.	.20
8/16/21	AEC	Reviewed letter from counsel regarding Alexander Flamer and that he no longer represents him; Revised letter and mailed new letter directly to A. Flamer.	.50
8/16/21	CAM	Receive and respond to numerous emails and calls regarding claims and the need to amend; spend time in database searching for investor's information in order to complete their calculations; log in all calls and log all amended claims and prepare memo to file regarding all claims amended and calls logged.	5.50
8/16/21	PCL	Review email/file history with S. Thomas, draft/finalize response to S. Thomas and related communications with K. Crawford(1.8); communications with B. Given and K. Crawford regarding missing jewelry(.2); communications with J. Brown, A. Cook, K. Crawford regarding Hunter letter(.3).	2.30
8/17/21	JLR	Receipt of and listen to multiple voicemails and review of email correspondence from Investor Victim, J. Gearhart, regarding questions as to his Claim Report Information packet; Return the call of Investor Victim, J. Gearhart, to address his questions of calculation of claim, objection, and whether anything is required to be returned.	.25
8/17/21	JLR	Receipt of and listen to multiple voicemails from Investor Victim, W. Eacker, regarding confusion as to his Claim Report information packet; Return the call of the same to review the Claim Report together; Schedule additional time to speak regarding the Claim calculation and recovery aspect of the same.	.25
8/17/21	CAM	Conference with Receiver regarding Intrinio and current mailing address; research corporate records regarding same (.2).	.20

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
8/17/21	CAM	Receive and review letters from five investors regarding their claims and the need to amend based on new information; amend claims and prepare letter to forward amended claims to the five investors; log amended claim values for future reporting; memos to file (2.5); continue responding to many investor calls concerning their claims and addressing all issues as well as noting the file regarding same (2.5); research address and delivery issues for Receiver on correspondence directed to Intrinio, Inc. and forward the necessary information and contacts to Receiver regarding same (.5); receive email request from Receiver and Realtor to get utilities turned on for 6616 Chew Avenue in Philadelphia (.5).	6.00
8/17/21	PCL	Communications with K. Crawford, J. Buffa and/or R. Foelber regarding Lucas Asher et al. issues and research and related file review(1.9);communications with D. Baer and K. Crawford regarding Rhawn,Rosemar and Cheltenham properties(.4);communications with K. Crawford regarding Wright declaration unrelated issues (.3).	2.60
8/17/21	DW	Researching subordination of creditor claims to investor claims.	2.00
8/18/21	MHS	Review various communications between Receiver and Jennifer Hacker in light of employment issues.	.40
8/18/21	JLR	Interoffice telephone call with P. Lewis regarding preparation (trial binders, script for cross examine, and powerpoint etc.) for 8/19 Hearing on the Receiver's two (2) applications for the six (6) Philadelphia Receivership Properties.	.25
8/18/21	JLR	Answer call from Investor Victim, W. Eacker, regarding further review and explanation of his computed Claim Report value and information detailed therein as scheduled.	.25
8/18/21	JLR	Prepare 5 hearing binders, hearing script, direct examination questions of K. Crawford, proposed Order Authorizing the Receiver's Sale of Certain Real Property; Create hearing PowerPoint as to the Receiver's Two Motions for Appointment of Appraisers, Appraisals, and Hearing for Sale of 6 Real Properties in PA; Revise 5 Hearing Binders to include 3 additional Receivership Orders and a copy of the Legal Notice ran in the Philadelphia Inquirer; Create Table of Contents and Cover Page for the Hearing Binders.	10.25
8/18/21	CAM	Work with PECO to establish utility service at 6616 Chew Ave in Philadelphia, and send application for gas services to PG Works (1.5); receive and review the PGW invoice for 404 N. Wanamaker and forward to Receiver for payment (.2); create excel chart to track and monitor Philadelphia real property sales and expenses (.5).	2.20
8/18/21	PCL	Prepare for hearing tomorrow on motion to confirm sale of six Philadelphia properties, related communications with J. Rolls and K. Crawford and related file review.	2.90
8/18/21	DW	Finished researched, drafted and emailed memo to K. Crawford.	1.00

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
8/19/21	JLR	Prepare and review hearing binders for correct 21 exhibits, print copies of the respective proposed Order, Script, Legal Notice, and Document Index for P. Lewis and K. Crawford; Transfer hearing PowerPoint to laptop for presentation at the hearing; Attend hearing as to set up and present PowerPoint.	3.75
8/19/21	CAM	Follow-up with PG Works on recent invoice received on 404 Wanamaker as well as service request for property located at 6616 Chew Avenue and 5135 Jackson St. and telephone call to realtor regarding same; document file (.5). Receive official claim objection and log and document same (.2); receive and respond to numerous emails and phone calls from investors on claims issues, including providing information regarding next steps, reviewing and amending claims as appropriate, logging in all claim amendments for reporting purposes; documenting file regarding same (5). Discussion with Receiver regarding real property insurance needs and coordinate same with insurance broker J. Meeham and forward all necessary information needed (.6).	6.30
8/19/21	PCL	Prepare for and attend hearing on motion to confirm sale of six Philadelphia properties with J.Rolls and K Crawford and related file review(4.0);communications with D.Baer and K.Crawford regarding Jackson Street issues(.1);communications with J. Wright and K.Crawford regarding declaration and related review of same(.4);communications with K. Crawford et al, regarding C. Cruz/MagicStar and related file review(.5); communications with K. Crawford regarding F.McCarthy jewelry and related review of jewelry pictures(.4); review of NASDAQ document and related follow up with K.Crawford, J. Buffa and R.Foelber(1.4).	6.80
8/20/21	CAM	Telephone call to and from J. Meeham regarding Philadelphia properties insurance coverage needs and email all details regarding same (.5); telephone call and email exchange with investor regarding claim amendment, adjust claims value in database and log into claim amendments log sheet for reporting purposes, and memo to file (8); telephone call with potential investor and research same, memo to file (.5); research court filed documents on the notices of sale for real properties in Philadelphia and update Philadelphia Properties detail spreadsheet (.4); organize and analyze claim data for top over priced coins (2.5); receive numerous email/phone inquiries from investors and respond to each (2).	6.70
8/20/21	DW	Researched WL head notes of J.K. Publications. Researched receivership specific cases dealing with general intangibles. Drafted memo and emailed same to K. Crawford.	2.90
8/23/21	WSY	Confer with James Stafford III concerning addresses from which Defendants' mail was diverted to the Receiver's office and send confirmation of the same.	.20
8/23/21	JLR	Receipt and review of email correspondence from Investor Victim, S. Gaw, regarding his claim and confusion as to timing of receipt of claim; Telephone call to the same to address the emailed issues.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
8/23/21	JLR	Contact the Clerk's Office of the Bullitt County District Courts in Kentucky to confirm receipt of our as required mailed Notice of Receivership and Related Stay; Clerk could not confirm receipt as a delay in mail due to personnel shortage.	.25
8/23/21	JLR	Receipt and review of email correspondences from potential local counsel in Kentucky, T. Sturgeon, regarding serving as local counsel to file Notice of Receivership and Related Stay in the Kentucky Court of Appeals as local Pro Hac Counsel is required by the Court; Receipt of and listen to voicemail from T. Sturgeon regarding the same.	.25
8/23/21	JLR	Draft and send responsive email to potential local counsel in Kentucky, T. Sturgeon, to provide the requested conflicts check information and detail our need for local counsel as is required to file the respective Notice of Receivership and Related Stay in the Kentucky Court of Appeals; Advise J. Stafford of status pending conflicts and the T. Sturgeon's response; Receipt and review of responsive email back from T. Sturgeon regarding conflicts check and potential assistance; Draft and send responsive email to the same confirming receipt and awaiting conflicts.	.50
8/23/21	CAM	Receive and return numerous telephone and email inquiries from investors on claims packages received, next steps, memo to file (2).	5.20
8/23/21	CAM	Receive email from attorney for investor who just learned of the receivership and discuss details concerning the claim and document same (.5); Follow-up email sent to J. Meeham regarding insurance quote needed for Philadelphia properties and communicate back to Receiver (.2); Receive several calls from investor and prepare letter to investor concerning her claim (.5); Continue analysis of claims value data for additional reporting needs of the Receiver and prepare chart for Receiver regarding same (2).	3.20
8/23/21	DW	Reviewed email thread from P. Lewis; researched whether a larger transfer of funds counts as acting in "active concert or participation". Discussion with P. Lewis on further research.	5.10
8/24/21	AEC	Reviewed correspondence from attorney regarding representation of Mr. Ferdman.	.20
8/24/21	JLR	Receipt and review of Invoice from the Philadelphia Inquirer regarding payment for legal notice of the 6 Philadelphia Properties; Telephone call to and subsequent email to Credit Account of the paper to address confusion as payment was made prior to the legal notice running.	.50
8/24/21	JLR	Interoffice assistance to C. Morris with providing information as to individual investors with pending Bayside metals necessary to address inquiries from attorney of potential Investor Victim.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
8/24/21	JLR	Receipt and review of email correspondence from potential local counsel in Kentucky confirming the clearing of conflicts and ability to act as local counsel to file Notice of Receivership and Related Stay in the KY Court of Appeals as is required to have local counsel; Draft and send responsive email to the same regarding set up of teleconference to engage and begin the process of filing the necessary aforementioned; Receipt and review of subsequent email from local counsel, T. Sturgeon, regarding teleconference call for 8/25; Send responsive email to the same providing teleconference confirmation and details.	.50
8/24/21	CAM	Follow-up on gas service for 5135 Jackson St. in Philadelphia as to why gas was not turned on, email to realtor regarding same and memo to file (.5); Many telephone calls to and from various investors on claim amendments, work in amendments to database and log into claim adjustments log sheet for Receiver's reporting purposes and memo to file regarding same (3.2); Email from Receiver on utilities for 404 N. Wanamaker St. in Philadelphia; telephone call to PECO regarding same; memo to file and log into Philadelphia Properties spreadsheet (.5); Continue clean up efforts on the claims value databases and begin preparing for next steps (1.5). telephone call to utility meter inspector regarding obtaining an underwriting certificate prior to getting utility service and arrange payment and schedule of same, email to Receiver and realtor regarding same (.5).	6.20
8/24/21	DW	Drafted memo and sent to P. Lewis.	3.50
8/25/21	JLR	Telephone conference with potential local counsel, T. Sturgeon, regarding engagement and scope of enagement as local counsel for filing of Notice of Receivership and Related Stay with J. Stafford as required by the KY Court of Appeals; Receipt and review of subsequent email correspondence from T. Sturgeon with attached proposed engagement letter; Provide to J. Stafford for review and approval by K. Crawford; Draft and send responsive email to T. Sturgeon with attached Notice of Receivership and Related Stay.	.75
8/25/21	JLR	Receipt of and listen to voicemail from D. Stokes of the Philadelphia Inquirer Accounting Department regarding confirmation of disregarding outstanding Invoice as to the running of the six (6) Philadelphia Properties July 2021 Legal Notice.	.25
8/25/21	JLR	Receipt and review of email correspondence from Investor Victim, S. Altman, regarding submission of her objection to Total Investor Claim Value and questions as to the next step; Draft and send responsive email to the same.	.25
8/25/21	JLR	Interoffice conference with K. Crawford regarding need for review of proposed Deeds of the respective six (6) Philadelphia Properties approved for sale; Review of the respective Deeds to confirm value, buyer information, and property address as to executed contracts; Notify K. Crawford of discrepancies in four (4) properties' information; Draft email detailing the specific discrepancies for K. Crawford for relaying the same to the Title Company.	1.00

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
8/25/21	JLR	Receipt of and listen to voicemail from Investor Victim, M. Strauss, requesting a return call regarding an unidentified Receivership Question; Return the call of the same.	.50
8/25/21	JLR	Receipt and review of subsequent email correspondence from engaged local counsel, G. Sumner, regarding update as to contact with the Clerk of the Kentucky Appellate Court; Draft and send responsive email to the same confirming receipt and awaiting direction as to the appropriate procedures of filing the Notice of Receivership and Related Stay.	.25
8/25/21	CAM	Receive and respond to text from State Inspection Authority regarding meter repairs needed for 404 N. Wanamaker and report back to Receiver and realtor (.5); Receive email from Trustee Service Group regarding Insurance coverage needs for Philadelphia properties and respond accordingly and memo to file (.8); Telephone call from PGW regarding gas turn on for 5135 Jackson Street and document repairs needed on flex lines leading from basement to stove and heater and email to Receiver and realtor regarding same (.5); Receive and respond to additional investors wanting to adjust their claims and documenting same, amend claim calculation forms for several and log into claim amendments report for the Receiver and memo to file regarding same (2.5).	4.30
8/26/21	JLR	Receipt and review of two separate email correspondences from retained local Kentucky state court counsel, G. Sumner and T. Sturgeon, regarding contact with the Chief Deputy Clerk of KY Court of Appeals and requesting telephone conference; Draft and send responsive email to both setting telephone conference and execution of the proposed Engagement Agreement.	.25
8/26/21	JLR	Telephone conference call with local KY counsel G. Sumner discussing the Deputy Clerk of the KY Court of Appeals procedural response to filing the necessary Notice of Receivership and Related Stay as required by the Court.	.75
8/26/21	PCL	Communications with M. Goode and K. Crawford regarding proposed order on Hearing to Approve Sale.	.20
8/27/21	JSS	Review proposed Notice of Stay in the appeal matter in Kentucky prepared by local counsel.	.50
8/28/21	PCL	Communications with K. Crawford, D. Baer regarding Rosemar purchase offer.	.30
8/30/21	JLR	Receipt and review of multiple correspondences exchanged between local retained KY counsel, G. Sumner and T. Sturgeon, regarding coordination of individual conference calls with parties involved in the state/appealed matter involving Receivership Defendants.	.25
8/30/21	JLR	Receipt and review of email correspondence from retained local KY counsel, T. Sturgeon and G. Sumner, regarding Entry of Appearance, Notice of Receivership, Exhibits A-D, and Executed Engagement Letter; Review and analysis of the aforementioned documents; Interoffice conference with J. Stafford regarding revisions to the documents acceptable to the Receivership as to correct representation of the respective Receivership Defendants.	.50

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
8/30/21	JLR	Telephone conference call with J. Stafford, local retained KY Counsel, G. Sumner, and counsel for New Direction regarding curtesy call as to the filing of Notice of Receivership and Related Stay in the Kentucky Court of Appeals; Discuss New Direction's frustrations as to the same.	.50
8/30/21	JLR	Answer call from Investor Victim, W. Eacker, regarding three thousand dollar discrepancy in his calculated Investor Claim Value; Discussion as to his right to object and coordination to speak w M. Morris regarding the same.	.25
8/30/21	JLR	Answer telephone call from Investor Victim, D. Burch, regarding question as to calculating his Total Recommended Claim Value and explained what that value means in terms of recovery; Encourage him to contact New Direction to receive purchase paperwork to verify the information provided on his Investor Claim Calculation.	.50
8/30/21	JSS	Communications with local counsel in Kentucky appeal matter scheduling conference with counsel of record in light of entry of Notice of Receivership.	.25
8/30/21	JSS	Telephone conference with local counsel and adverse counsel regarding Notice of Stay filing. E-mail communication regarding same.	.50
8/30/21	PCL	Communications with K. Crawford regarding letter to G. Besen regarding receivership contempt order issues and related review/revision of letter(.4);communications with K. Crawford and D. Baer regarding Chew and Rhawn properties(.3);review G. Besen correspondence (.3); communications with J Buffa, K. Crawford, R. Foelber regarding status of receivership/related issues(.80).	1.80
8/31/21	JLR	Telephone conference call with J. Stafford, local retained KY counsel, T. Sturgeon, and Plaintiffs' Counsel, M. Valenti, regarding Plaintiffs' opposition to the filing of the Notice of Receivership and Related Stay; Discussion as to application of the Stay over third-party New Direction; Provide to J. Stafford two (2) prior class action cases filed against custodians Entrust and New Direction to review in response to allegations made during the respective conference call.	.75
8/31/21	JLR	Draft Receiver's Motion for Appointment of Appraisers, Approval of Appraisals of Certain Real Property, and Setting Hearing Regarding Approval of Sale as to the Rosemar Property.	1.25
8/31/21	JLR	Draft and prepare Appendix in Support of Receiver's Motion for Appointment of Appraisers, Approval of Appraisals of Certain Real Property, and Setting Hearing Regarding Approval of Sale.	.50
8/31/21	JLR	Draft Order Appointing Appraisers, Approving Appraisals, and Setting Hearing Regarding Approval of Sale of Certain Real Property.	.25
8/31/21	PCL	Communications with K. Crawford regarding show/cause contempt motion against Asher and Batashvili and begin review(.5);)communications with K. Crawford regarding letter to G. Besen regarding receivership contempt order issues and related review(.4).	.90

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
9/01/21	JLR	Interoffice conference with C. Morris regarding objection made by Whipple Law Firm on behalf of Investor Victim, D. Zeihen; Discussion as to how to respond to claim of no receipt of metals via a Declaration.	.25
9/01/21	CAM	Analyze data from metals database and prepare chart showing four top overpriced coins and the average unit price as well as the over all dollars invested for each over priced coin.	2.50
9/01/21	CAM	Work on getting PECO utility service for 404 N. Wannamaker, Philadelphia; several telephone calls regarding the underwriting certificate and the inability of applying for utilities on-line, and ultimately getting service set up by phone as opposed to online.	2.00
9/01/21	CAM	Receive phone calls and emails from investors regarding metals claims and responding to all and memo to file for each, as well as prepare amended claims for several.	3.00
9/01/21	PCL	Communications with D. Baer, K. Crawford regarding Wanamaker and Rhawn properties(.3); communications with K. Crawford ,et al., regarding coin prices/brokers complaint(.4); communications with L.Kumin, K. Crawford regarding Intrinio document production request(.4).	1.10
9/01/21	DW	Spoke to K. Crawford regarding research for case law that supports our claim that a receiver can be a custodian for a business record in the exception to the hearsay rule.	.70
9/02/21	AEC	Conference with K. Crawford regarding broker letters; Develop spreadsheet to track letters.	1.00
9/02/21	JLR	Answer call from Investor Victim, B. Revere, requesting explanation as to recovery of her Investor Claim and status update as to the Receivership; Explain to B. Revere recovery and the present Claim objections process.	.25
9/02/21	CAM	Extended phone calls to and from Philadelphia Water and email documents necessary to get water turned on to 404 N. Wannamaker; follow up on the PECO electric hook up; email to realtor regarding same (1.5); Research PayPal General Counsel contact information and forward same to Receiver. (.2); Numerous emails and phone calls from investors regarding claims and respond to all, and amend where necessary and document file for all (5).	6.70
9/02/21	PCL	Communications with K. Crawford. D. Baer, et al., regarding Wannamaker property issues(.2); communications with K. Crawford, A. Spencer, R. Foelber, J. Buffa, et al., regarding conditional withdrawal grounds, Asher production deficiencies.	.50
9/02/21	DW	Spoke to K. Crawford regarding: letter from CA Franchise Tax Board; letter from Oregon DOR; letter from Sacramento EDD; and Information Document Request from IRS. We discussed the letters that he wants me to draft responding to each.	.50

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
9/03/21	CAM	Review defendants' records to try and locate purchase information for investor M. Johnson (.5); Email and telephone call with M. Rogers regarding non-metal claim; review all documentation; email to Receiver regarding recommended claim adjustment and finalize same to email to investor; memo to file regarding same (1.2); Telephone calls and emails with three additional investors who just became aware of the receivership, and spend significant time searching defendant records for any information regarding same; memo to file (1.5); Continue reviewing and responding to investors' emails and phone calls regarding their claims and the status of the case; memo to file regarding same (3.5); Telephone call with attorney for investor D. Zeihen regarding formal claim objection and discuss same; email to receiver to amend claim (.30).	7.00
9/03/21	PCL	Communications with A. Cook and K. Crawford regarding broker complaint review(.3); communications with K. Crawford and L. Kumin regarding Intrinio call and document request and related file review(.5).	.80
9/03/21	DW	Drafted petition to challenge assessment by the California EDD in form of a letter by K. Crawford.	2.50
9/04/21	PCL	Communications with K. Crawford regarding Asher/Batashvili contempt/show cause motion and related review/editing of same(.9); communications with K. Crawford regarding Intrinio production issues(.4).	1.30
9/07/21	AEC	Revise draft complaint to update all contact information and ensure all of the brokers are added.	3.00
9/07/21	CAM	Receive phone calls and emails from numerous investors regarding claims packages received and respond to all, as well as document file regarding same (2.5); amend various claims according to new information and forward to investors and document file regarding same (1.5); work with investor L. Yarter regarding his wife's claim and analyze spreadsheets documenting all metals transactions and update spreadsheet regarding same (1.2).	5.20
9/07/21	PCL	Communications with A. Bernstein regarding David Bleeden negotiations and related file review and follow up with Kelly Crawford; (8)communications with K. Crawford regarding sale price for Philadelphia property (.2).	1.90
9/07/21	PCL	Communications with J. McClay, D. Baer, K. Crawford regarding Chew purchase offer (.2);communications with K. Crawford and L. Kumin regarding Intrinio production(.3); communications with K. Crawford and A. Bernstein regarding D. Bleeden(.3); review and revise Asher, Batashvili contempt motion and related communications with K. Crawford(.9).	1.70
9/08/21	AEC	Draft email outlining the brokers, entities, and amounts they are bring sued for to assist in drafting status report.	1.00
9/08/21	AEC	Revise complaint to ensure accurate broker information.	1.50

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
9/08/21	CAM	Telephone call with investor L. Yarter on his wife's amended claim, finalize same and email/mail out to investor and document file (.5); Receive and return phone calls and emails from various investors requesting updates and claim changes (2); Review Philadelphia properties detail spreadsheet and update all RP insurance costs and other related expenses (1.5); Telephone call with two additional unreported investors and obtain necessary information to add their metals claims (.8).	4.80
9/08/21	JSS	Prepare regulatory update to Receiver in preparation for Receiver's update to Court.	.25
9/08/21	PCL	Communications with K. Crawford and L. Kumin regarding Intrinio document production and related file review(.8) communications with A. Bernstein and K. Crawford regarding D. Bleeden broker commission settlement(1.0); communications with J. Buffa, R. Foelber and K. Crawford regarding status/ latest developments and file review(.6); communications with K. Crawford regarding C.Cruz/MagicStar motion to compel document production and related file review(.4); communications with D. Baer, K. Crawford regarding Cheltenham/Chew property issues (.3); communications with A. Cook and K. Crawford regarding brokers complaint review/revisions(.3).	3.40
9/09/21	AEC	Draft schedules to add to the complaint; Update broker information in complaint.	4.00
9/09/21	CAM	Reviewing claim information from many investors to determine if an objection is being lodged and add to respective investor files (1); return investor calls and emails received concerning claim adjustments, update data base, email confirmation to investor, document file (3.5).	4.50
9/09/21	PCL	Communications with A. Cook and K. Crawford regarding Broker complaint revisions/issues(.5);communications with K. Crawford, J. Buffa, R. Foelber regarding J. McWright regarding declaration and/or related review of same(.4).	.90
9/10/21	AEC	Draft David Bleeden schedule based upon new information provided.	.80
9/10/21	JLR	Receipt of and listen to multiple voicemails from Investor Victim, S. Hammerlund, regarding confusion as to receipt and understanding of Investor Claim Packet and her recovery of the same; Schedule additional telephone appointment to further explain the information and her individual claim and recovery of the same.	.50

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
9/10/21	CAM	Review extension notice for change of address of defendants in CA and talk to USPS regarding same (.5); telephone call from investor D. Spencer regarding late filed claim, gather details, prepare claim form, update database, document file, and email to investor (1.5); Review email from J. Stafford regarding MT investors and research same, locate discrepancies in total claims value and adjust accordingly, report back to J. Stafford, and memo to file (1.2); telephone to investor EH from Montana regarding metals claim, gather details, prepare claim form, update database, document file, and email to investor (1.5); Review email from PayPal with encrypted files for two PayPal accounts, download files and update file regarding same (.5); Receive and address many calls from investors wanting to know the next steps in the claims process and addressing other claims issues (1.2).	6.40
9/10/21	PCL	Communications with J. Buffa, K. Crawford regarding latest developments(.4);communications with K. Crawford, R. Foelber, J. Buffa regarding Fifth Fee Application draft and/or related review(.4); communications with K. Crawford and A. Cook regarding D. Bleeden commissions and broker complaint and schedules and related review of file/ draft complaint(.5).	1.30
9/13/21	AEC	Revise David Bleeden's schedule to attach to receiver's complaint; Work on exhibits for broker complaints specially information regarding payments.	1.75
9/13/21	JLR	Answer call from Investor Victim, J. Gearhart, regarding confirmation as he couldn't remember that if he wasn't contesting his Claim Value that no action was required; Confirmed the same.	.25
9/13/21	JLR	Receipt of and listen to voicemail from Investor Victim, M. Peden, requesting confirmation as to no objection of the Investor Claim Package Information means he concurs; Confirmed.	.25
9/13/21	JLR	Receipt and review of internal email correspondence from C. Morris regarding Investor Victim, L. Schwartz, confirming as to whether or not Schwartz ever responded to our pending Bayside metals correspondences as receipt/no receipt of the same effects her claim value total; Draft and send email correspondence to C. Morris addressing the same.	.25
9/13/21	JLR	Receipt and review of internal correspondence from C. Morris regarding Investor Victim, S. Gaw, regarding confirmation as to whether or not S. Gaw received his pending Bayside metals as such would impact his calculation form; Speak with C. Morris regarding the same and send subsequent email correspondence detailing the respective Bayside metals communications and transaction.	.25
9/13/21	JLR	Receipt of and listen to voicemail from Investor Victim, C. Harris, requesting status update as to his wife and his individual respective claim and status update; Provide status update; Perform review of both Investor's total recommended claim value to explain option to object.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
9/13/21	JLR	Receipt of and listen to multiple voicemails from Investor Victim, W. Eacker, regarding discrepancy in total calculated claim; Explain the discrepancy and schedule appointment for him to speak with C. Morris to consider objecting.	.25
9/13/21	JLR	Receipt and review of responsive email correspondence from Investor Victim, S. Altman, wherein she discusses her confusion as to the calculation of her Total Claim Value; Forward to C. Morris for further review and consideration as to a response to the same.	.25
9/13/21	JLR	Receipt and review of multiple email correspondences between local retained Kentucky counsel, J. Stafford, and I confirming the KY Court of Appeals temporary suspension of all actions in the Appeals Court following the filing of the Notice of Receivership and Related Stay; Conference with J. Stafford regarding the procedural issues with Plaintiff's Counsel's Opposition to the Stay and options to address the same without necessitating briefing.	.25
9/13/21	JLR	Draft email correspondence to Plaintiff Counsel in the Kentucky Court of Appeals case involving Receivership Defendants in response to the KY Appellate Court's September 2nd temporary suspension order of all appellate steps pending final order of the court; Seek to schedule telephone conference to discuss present procedural posture (stay) and the Receiver's position as to allowing the case to proceed as against defendant New Direction; Provide to J. Stafford for final review.	.50
9/13/21	JLR	Answer call from Investor Victim, B. Mitchell, notifying us that he had yet to receive his Investor Claim Calculation; Inform him of us Total Recommended Claim value over the telephone and explain the objection process; Address the issue of delivery of Claim Information with C. Morris.	.25
9/13/21	JLR	Receipt of and listen to voicemail from Investor Victim, C. Snyder, requesting status update as to her Claim; Return the call of Investor; Provide status update and confirm no objection to Claim Calculation.	.25
9/13/21	JLR	Receipt of and listen to voicemail from Investor Victim, M. Radney, requesting help as to understanding the Claim Packet Information; Unable to leave voicemail; Send email correspondence regarding the same and requesting return call to explain the Claim Report.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
9/13/21	CAM	Telephone call with investor who did not receive claims package, update address, send package back by email and by regular mail, memo to file regarding same (.5); Receive and review renewal notice from Network Solutions and discuss with J. Stafford, update account and initiate payment for additional year of domain forwarding service, memo to file regarding same (.4); Interoffice conference with J. Rolls regard claim issues (.2); Finish claim amendment for investor and update database, revise claim calculation form and forward to investor, add to amendment log and memo to file (.8); Review claim amendment sent by regular mail from investor 00612 and made appropriate adjustments and amend claim calculation form accordingly and send to investor, update amendment log sheet and memo to file (.5); Telephone call from investor who wishes to lodge an objection to her claim, email details to receiver (.3); Telephone call with CA attorney H. Stern to update his case with current receivership status and additional information (.3); Receive and respond to an increased number of investors requesting status of case and to review their claims for possible amendments, log all details into case file (2.00).	5.00
9/14/21	PKJ	Research and review case law regarding the issue of common enterprise draft email memo to Kelly Crawford regarding same.	1.70
9/14/21	AEC	Draft chart showing broker accounts to add as an exhibit to petition.	.70
9/14/21	JLR	Draft Notice of Withdrawal of Receiver's Motion for Appointment of Appraisers, Approval of Appraisals of Certain Real Property, and Setting Hearing Regarding Approval of Sale.	1.00
9/14/21	JLR	Answer telephone call from Investor Victim, M. Radney, requesting that we help walk her through the Claim Calculation Information and Total Recommended Claim; Explain the opportunity to object, if applicable.	.25
9/14/21	JLR	Receipt of and listen to voicemail from Investor Victim, J. Raganswood, regarding confusions as to Claim Calculation information; Leave voicemail asking for return call.	.25
9/14/21	JLR	Interoffice conference with J. Stafford regarding review of draft email correspondence to Plaintiff Counsel in Kentucky Appellate/Circuit Court case involving Receivership Defendants following Appellate Court's 9/2/2021 Suspension Order of all appellate steps pending final Order and the Receiver's position as to the stay; Telephone Conference with local retained KY Counsel, T. Sturgeon, regarding contact strategy with Plaintiff Counsel and status of Circuit Court case docket; Revise email correspondence to reflect J. Stafford redlines.	.75
9/14/21	CAM	Receive and review a large volume of emails and voicemails from over the weekend from investors who are confused by their claims package and respond to each, made necessary adjustments and amendments where necessary and update claims log and file regarding same (5).	5.50
9/14/21	JSS	Office conference with Receiver regarding status of downloading documents seized by FBI.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
9/15/21	JLR	Receipt and review of responsive email correspondence from Plaintiff Counsel, M. Valenti, in the Kentucky Appellate/Circuit Court cases involving Receivership Defendants regarding his position as to a temporary stay against the Receivership Defendants; Interoffice conference with J. Stafford regarding the proposition offered by M., Valenti and its failure to comply with the Receivership Order; Draft responsive email to the same for J. Stafford's review.	.50
9/15/21	CAM	Check in with Philadelphia realtor regarding real properties listed (.1); Receive call potential buyer for domain and add to list and calendar to follow-up in one year (.2); Continue returning phone calls and responding to emails from investors regarding next steps forward and/or requests to amend claims (5).	5.30
9/15/21	PCL	Communications with K. Crawford regarding meet and confer email on motion to show cause for Asher and Batashvili and related drafting of same(1.3);review of motion and brief and draft (.9).	2.20
9/16/21	JLR	Perform Westlaw research to provide contact information/general counsel information for the self-directed IRA custodians Entrust Group, New Direction IRA, and Equity Trust as recent telephone calls with Investors allege the custodians are not providing information as to their accounts or assisting with liquidation because the metals are in Receivership; Contact information necessary to preparing letters to the same correcting the misinformation.	.50
9/16/21	JLR	Receipt of and listen to voicemail from Investor Victim, W. Eacker, regarding a correction to Claim Calculation as his supporting documentation has a different amount that he previously remembered; Return the call of same to redo his Claim Calculation to the original value.	.25
9/16/21	CAM	Receive and return calls, amend various claims, update claim amendment log sheet and document file (2.5); Receive and respond to email and phone call from Montana State regarding MT investors, and review MT spreadsheets for their investors, conduct an audit of all MT investors, compare to MT State's list, and generate a chart of claim discrepancies and document file regarding same (2).	4.50
9/16/21	PCL	Communications with K. Crawford, D. Baer, et al., regarding 19th St. purchase related documents/developments(.4); communications with K. Crawford, G. Besen, A. Spencer, J. Buffa, et al., regarding finalization and/or filing of motion to show cause why Asher and Batashvili should not be held in contempt, meet and confer protocol and related review of motion and /or related brief(2.5).	2.90
9/17/21	WSY	Review of the Contempt Motion filed on behalf of Receiver in anticipation of Response thereto by Defendants, as directed by Peter Lewis.	.70
9/17/21	JLR	Receipt and review of internal email correspondence from P. Lewis requesting assistance with the Receiver's 9/16 filing of his Emergency Motion for Show Cause Hearing as to Defendants Asher and Batashvili Contempt; Draft and send responsive email to the same confirming availability to assist with preparation of the same.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
9/17/21	JLR	Answer the call of Investor Victim, R. Rhyne, asking question as to whether closure of his self-directed IRA would disrupt receipt of his Claim; Answer the same.	.25
9/17/21	PCL	Communications with K. Crawford, et al., regarding C. Cruz portfolio Insider claim and related file review(.4); receipt and review of P. Gomersall correspondence regarding preservation letter to Kixie(.3); communications with F. O'Connor, et al., regarding PipeDrive inquiry(.2); communications with J. Rolls, W. Young, K. Crawford regarding show cause strategy meeting, etc.(.40); communications with K. Crawford, L. Kunin regarding Intrinio preservation letter and related file review (.3).	1.70
9/18/21	JLR	Review and analysis of Receiver's Emergency Motion for Show Cause Hearing Defendants Asher and Batashvili Contempt, the Appendix of the same with attached respective Declarations, and the CFTC's Brief in Support of the Receiver's Emergency Motion in preparation of meeting with P. Lewis to prepare for hearing (ie preparation of hearing PowerPoint, binders, and script etc).	2.00
9/18/21	PCL	Communications with J. Buffa, K. Crawford, F. O'Connor, et al., regarding document preservation request.	.30
9/20/21	JLR	Receipt of and listen to voicemail from Investor Victim, B. Buiskool, regarding telephone call from an Arkansas individual contacting the Investor as it relates to the Receivership; Leave voicemail requesting return of call.	.25
9/20/21	JLR	Receipt of and listen to voicemail from Investor Victim, M. Strauss, regarding issue with custodian Directed IRA and the misuse use of another Investor's contact information on her paperwork; Address the same and explain the confusion as to the other Investor.	.25
9/20/21	JLR	Receipt of and listen to voicemail from Investor Victim, D. Neeley, regarding status as to whether Receiver received anything from the metals company; Return call to explain the process and provide the status of the same; Review of Claim Calculation and confusion as to receipt of metals for objection; Address the same.	.25
9/20/21	JLR	Receipt of and listen to voicemail from Investor Victim, R. Kolbow, and subsequent email correspondence from the same regarding status of the Receivership; Return the call of same; Draft and send email correspondence to Investor providing an update as requested.	.25
9/20/21	JLR	Answer subsequent call from Investor Victim, M. Strauss, regarding recent communication with custodian Directed IRA and confusion as to liquidation of metals regardless of Receivership being in place.	.25
9/20/21	JLR	Receipt of and listen to voicemail from Investor Victim, A. Thomason, regarding confusion as to receipt of the Claim Report Information and whether or not she must fill it out; Return the call of the same; Leave voicemail requesting return of call.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
9/20/21	JLR	Receipt and review of email correspondence from Investor Victim, J. Lindenmuth, regarding confusion/questions regarding the total recommended claim; Draft and send responsive email to the same explaining what the total recommended claim value means.	.25
9/20/21	JLR	Telephone call to the Civil Circuit Clerk of Bullitt County, KY, to ascertain the status of the respective Judge's entrance of our Proposed Order of Stay of the Circuit Court Case involving Receivership Defendants.	.25
9/20/21	JLR	Receipt of and listen to voicemail from Investor Victim, L. McMillin, requesting status update; Return the call of the same and provide Total Recommended Claim information and explanation; Send subsequent email to C. Morris requesting that she provide via email correspondence the Claim Information to L. McMillin.	.25
9/20/21	JLR	Return the voicemail of Investor Victim, J. Raganswood, to explain the Total Recommended Claim value and recovery of the same; Answer questions regarding the status of the Receivership.	.25
9/20/21	JLR	Answer the call of Investor Victim, R. Kolbow, regarding prior email correspondence as to status update and explaining his Total Recommended Claim value.	.25
9/20/21	JLR	Answer the return call of Investor Victim, S. Kelly, regarding status of distribution of her total recommended claim value as is needed for husband's medical expenses; Explain the same.	.25
9/20/21	JLR	Receipt and review of responsive email from Investor Victim, J. Lindenmuth, regarding his Total Recommended Claim value; Draft and send responsive email to the same confirming receipt and answering.	.25
9/20/21	JLR	Answer the return call of Investor Victim, B. Buiskool, regarding the misinformation provided by Directed IRA confusing two (2) Investor Victims; Address problem with Investor Victim, B. Buiskool's, mother, Investor Victim, M. Dedoes, never receiving her Claim Report Information; Draft and send email to C. Morris to address the issue of delivery of Claim Report Information to the same; Provide status update to both.	.25
9/20/21	PCL	Communications with F. O'Connor, J. Buffa, K. Crawford, et al., regarding Pipedrive documents requested and legal basis for same and related file review(1.3);communications with K. Crawford regarding follow up with C. Cruz, MagicStar counsel regarding requested documents and C. Cruz deposition, draft/revise final formal demand for documents and related file review(1.5).	2.80
9/21/21	WSY	Confer Receivership Team concerning strategy for hearing on Third-Contempt Motion against Defendants Asher and Batashvili (.7); Additional review of Contempt Motion, CFTC's Memorandum of Law in support of Contempt Motion (.7); Draft summary of contents of strategy session for Team's review with reference to both Motions and evidence in support (.5).	1.90

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
9/21/21	JLR	Attend interoffice telephonic conference with P. Lewis, K. Crawford, and W. Young preparation and strategy session for the upcoming Hearing regarding the Receiver and CFTC's respective Show Cause Briefing as to Contempt.	1.00
9/21/21	JLR	Telephone calls with attorney, J. Brewster, regarding notification that his client Investor Victim, J. Raganswood, regarding confusion as to her contacting the Receiver and his office regarding the Receivership.	.25
9/21/21	JLR	Answer the call of Investor Victim, A. Thomason, requesting explanation of the Claim Report Information (i.e. her total recommended claim value) and discrepancy in cash reflection on the same; Interoffice conference with C. Morris regarding answering the cash discrepancy and email correspondence to Investor Victim providing copies of the Claim Report Information as requested.	.50
9/21/21	JLR	Interoffice conference with K. Crawford regarding the drafting of a Notice of Deposition for C. Cruz; Contact US Legal to ascertain the details of remote deposition conducted at LA Office; Draft Notice of Deposition of Carlos Cruz.	1.50
9/21/21	JLR	Draft Subpoena for Non-party C. Cruz Deposition in Civil Lawsuit; Provide the same to K. Crawford and P. Lewis for review.	1.00
9/21/21	JLR	Receipt and review email correspondence from P. Lewis regarding task of identifying all cites/references to C. Cruz and related entity MagicStar in the recent Receiver's Emergency Motion for Show Cause Hearing and the CFTC's respective briefing in support of the same.	.25
9/21/21	CAM	Analyze investor database and extract all Utah investors for Receiver (1.2); Receive several email requests from investors to resend claims packages by email and US First Class Mail (1.2); Review information received from MT state in efforts to reconcile investor initial purchases (.8); Extract all investors from database and organize list of just investor names and forward to Receiver (.8); Receive communication from Philadelphia Water Department regarding 404 N. Wanamaker (.1); Receive and respond to investor who just learned of the receivership and add additional claim, prepare claims package and communicate with investor regarding same (1.5).	5.60
9/21/21	JSS	Telephone conference with KY local counsel regarding a conflict in representation of Receiver.	.25
9/21/21	JSS	Conference with Receiver regarding request for conflict waiver from KY counsel.	.25
9/21/21	JSS	Strategy conference call with Receiver and P. Lewis regarding claims asserted and most expeditious legal proceeding to address defendants' breaches of SRO.	.50
9/21/21	PCL	Communications with K. Crawford, et.al., regarding broker complaint defendant communications with W. Vera.	.60

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
9/21/21	PCL	Communications with K.Crawford, J. Rolls, and Walker Fults, regarding hearing/strategy on show cause motion against Asher and Batahsvili and related file review(1.5);communications with K. Crawford and G. Besen regarding [REDACTED] [REDACTED] issues and Related file review(.8); review file materials and continue drafting letter to MagicStar counsel regarding turnover of documents (.9);communications with J. Rolls regarding review of contempt appendix for cite purposes(.4).	3.60
9/22/21	JLR	Review the following: (1) Receiver's Emergency Motion for Show Cause Hearing to Hold Defendants Asher and Batashvili in Civil Contempt; (2) Appendix in Support of the same; and (3) Plaintiffs' Memorandum in Support of Receiver's Emergency Motion for Show Cause to identify and provide to P. Lewis all references to C. Cruz and MagicStar Arrow necessary for email correspondence and upcoming deposition of the same.	.75
9/22/21	JLR	Perform additional search of provided cite to C. Cruz in Plaintiffs' Memorandum of Law In Support of the Receiver's Emergency Motion to Hold Defendants Asher and Batashvili in Civil Contempt; Review the at-issue cite and provide the reviewed same to P. Lewis at his request.	.25
9/22/21	JLR	Revise Subpoena for C. Cruz to reflect the redlines of K. Crawford; Provide to P. Lewis for final review and service of same.	.75
9/22/21	CAM	Receive and review State of MT report on investor #00283, interoffice conference with J. Stafford regarding same, telephone call with investor to discuss discrepancies in total investment dollars, and telephone call to M. Murray of MT to discuss same (1.2); Telephone call with newly added investor to discuss his investment and to add his claim, research defendants' documents to determine if any purchase invoices were issued, add his claim to the database and prepare claims package to email and mail out (1.5); Sift through emails and documents in DISCO for information related to P. Batashvili and save/print to forward on to Receiver for litigation purposes (2.5); Continue efforts in reviewing and responding to abundance of investor calls and emails and document file regarding same (2.5).	7.20
9/22/21	PCL	Review file materials and revise, finalize email to Scott Thomas regarding obligations of MagicStar to respond to request for documents and related communications with K. Crawford regarding same(2.5); review C. Cruz deposition notice and subpoena and related Communications with J. Rolls and K. Crawford(.5); communications with F.O Connor, J. Buffa, K. Crawford, et al., regarding Portfolio communications and related follow up(.7); communications with D. Baer, K. Crawford, et al., regarding Philadelphia properties (.4).	4.10
9/22/21	PCL	Communications with K. Crawford, J. Rolls, W. Fults regarding preparation for upcoming hearing on motion for Asher and Batashvili to Show Cause and related file review.	1.70
9/23/21	AEC	Conference with K. Crawford regarding [REDACTED] and review of case information to prepare to draft petition.	.60

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
9/23/21	JLR	Revise Deposition Subpoena of C. Cruz to reflect P. Lewis redline; Prepare and provide the same to P. Lewis for final review and service of same.	.25
9/23/21	JLR	Prepare list of all parties' active counsel to be noticed for service via email of the Notice of Deposition of C. Cruz and corresponding subpoena of C. Cruz in accordance with the Rules for coordination of service as requested by P. Lewis.	.50
9/23/21	JLR	Receipt of voicemail from Investor Victim, S. Kelly, regarding her husband Investor Victim, J. Kelly's, coins and having a discrepancy in the value of the coins; Interoffice conference with C. Morris regarding S. Kelly's frustrations/confusion as to the per value of the coin and lodging an objection to the calculation.	.25
9/23/21	JLR	Draft transmittal email correspondence to all parties' active designated counsel of record for service of the Notice of Deposition and related Subpoena of C. Cruz.	.25
9/23/21	PCL	Communications with K. Crawford, D. Baer, et al. regarding Wanamaker residence contract.	.30
9/23/21	PCL	Finalize and serve Notice of Deposition on C Cruz on S. Thomas and related communications with K. Crawford and J. Rolls(.6).	.60
9/24/21	PCL	Communications with K. Crawford, et al., regarding Portfolio Insider developments(.4), communications with C. Jackson and K. Crawford regarding Portfolio Insider investigation(.4); continue drafting motion to compel MagicStar to produce documents and related file review(.80); Receipt and review of communications from S. Thomas regarding production of MagicStar documents and related communications with K. Crawford et al(.40);review Lincoln Property and South Park preservation demands (.4).	2.40
9/27/21	JLR	Receipt and review of email correspondences from, S. Bansal, CA local counsel regarding Status Report due in stayed CA civil court cases with Receivership Defendants.	.25
9/27/21	JLR	Answer call from Investor Victim, L. Burch, regarding misinformation from custodian New Direction and confusion as to receipt of Receivership Claim funds; Interoffice conference with C. Morris for appropriate answer to Investor question.	.25
9/27/21	JLR	Receipt of and listen to subsequent voicemail from Investor Victim, D. Burch, requesting follow-up as to confusion as to receipt of Claim funds; Return the call of same.	.25
9/27/21	JLR	Return the call of Investor Victim, S. Hammerlund, to review and explain the Claim Report Information and her specific Total Recommended Claim; Draft and send subsequent email correspondence to Investor Victim with copy of her Claim Report for her review and conference tomorrow.	.25
9/27/21	PCL	Communications with K. Crawford, J.Ravean regarding Shenae South Park demand.	.40

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
9/27/21	DW	Reviewed notice from CA Franchise Tax Board; reviewed relevant materials and researched CA tax law; drafted letter to the CA FTB protesting the tax penalty in the notice.	3.50
9/28/21	JLR	Receipt of and listen to voicemail from Investor Victim, S. McCauley, regarding confusion as to Receivership telephone and request for property information (via the correct telephone number); Return the call of same to address the confusion in telephone numbers.	.25
9/28/21	JLR	Answer call from Investor Victim, S. Hammerlund, regarding further explanation of her specific Claim Information and explaining the objection process.	.25
9/28/21	JLR	Receipt of and listen to voicemail from Investor Victim, W. Hodges, regarding his receipt of the Claim Report Information just now and confusion as to what it means; Return the call of same.	.25
9/28/21	JLR	Return the call of Investor Victim, D. Burch, to answer his question as to how the Receivership funds will be disbursed back to him as he had concerns over taxes; Answer the same.	.25
9/28/21	JLR	Receipt and review of email correspondence from, T. Wright, of US Legal regarding scheduling of non-party deposition of C. Cruz with coordination of LA office space for deponent; Confirm the scheduling.	.25
9/28/21	JLR	Receipt of and listen to voicemail from L. Lalick spouse of Investor Victim, M. Lalick, regarding questions as to liquidation of remaining metals with the pending Receivership; Return call to address her questions.	.25
9/28/21	CAM	Receive and respond to email regarding address correction for investor (.1); Receive and review formal objection from investor 00567, review and double check all calculations for accuracy, and call investor to discuss, as well as log in formal claim objection (.5); Receive and review formal response to claim calculations from investor 00658, and telephone call to discuss, and memo to file regarding same (.5); Receive and review PECO billing invoice for Chew property in Philadelphia and log into property detail spreadsheet and request payment (.1); Review requested amendments for claim no. 00028 and make necessary adjustments to database and prepare amended claim, log into amendment spreadsheet and forward to investor (.8); Confer with J. Rolls regarding future interim distribution and how distribution checks will be made (.1); Receive email communication from investor 00800 and confirmation of updated address, as well as requested challenges to related claim no. 01299, make appropriate adjustments and prepare and mail out amended claim and document file regarding same (1.5); Email communication with investor No. 01732 and examine wire transfer documents initiated after the date of the receivership and respond accordingly, and email to Receiver regarding same (.8); Review additional documents for investor 01645 and make necessary adjustments to database and prepare and mail out amended claim and document file (.8); Review and return numerous investor calls requesting status of case and next steps (2).	7.20

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
9/28/21	PCL	Receipt and review of Jackson report on Portfolio Insider premises and related communications with K. Crawford and C. Plaxton regarding same and potential relocation of P. (1.0); communications with C. Koonce, K. White regarding D. Ned, et al., representation (.4).	1.40
9/29/21	JLR	Interoffice conference with C. Morris regarding discrepancy in Montana Investor Claim and supporting documentation as to the claim; Review of documentation.	.25
9/29/21	CAM	Receive and respond to an abundance of last minute claim changes from investors and prepare amendments accordingly, and discuss next steps forward (4.5).	6.50
9/29/21	JSS	Review Receiver's Status report to Texas District Court and prepare Fifth Status Report to California Federal District Court.	1.50
9/29/21	PCL	Receipt of Winston and Strawn production of Magic Star documents and related communications with K. Crawford regarding same.	.80
9/30/21	JLR	Review of Receiver's Fifth Status Report in the Punke v. Chase Metals, LLC et al. the stayed California Federal Court Case Involving Receivership Defendants; Revise and provide to J. Stafford for final review.	.25
9/30/21	PCL	Communications with K. Crawford and B. Gluck regarding Portfolio Insider.	.20
9/30/21	DW	Reviewed letters and notices from Oregon DOR; researched how to challenge the tax, penalties, and interest; drafted letters to the DOR and a complaint to the Tax Court to challenge the taxes, penalties, and interest.	2.00
10/01/21	AEC	Draft petition to Magic Star defendants; Draft exhibits to petition; Review invoices provided by Magic Star Defendants.	3.00
10/01/21	JLR	Receipt and review of email correspondence from Investor Victim, L. Lalik, regarding alleged relationship between New Direction and Metals.com.	.25
10/01/21	JLR	Receipt of and listen to voicemail from Investor Victim, A. Thomason, regarding objection and revision to her claim value; Confirm the same with C. Morris.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
10/01/21	CAM	Review Philadelphia real property spreadsheet and prepare for updates, review all utility bills that arrived and log in and place in line for payment, review all closing statements on the four properties that have closed, and finally, prepare correspondence to Trustee Group to cancel the property insurance on the four sold properties (2.5); Prepare status memo to Receiver regarding conclusion of objection period and additional work to be done (.8); Finalize matters with state of MT regarding investor monetary discrepancies and forward to Receiver (.5); Finalize matters with state of MT regarding investor monetary discrepancies and forward to Receiver (.5); Finalize matters with state of MT regarding investor monetary discrepancies and forward to Receiver (.5); Telephone call with Whipple Law Group regarding claim No. 00283, and receive Declaration of Investor and prepare and forward amended claim calculation (.5); Telephone call with investor regarding post-receivership deposit of monies wired and forward to receiver for follow-up (.2); Receive last minute objection and log in and discuss same with investor prior to forwarding to Receiver (.5); Receive and respond to additional investor calls/emails (1.5).	6.50
10/04/21	AEC	Continue to work on [REDACTED] petition and exhibits.	1.00
10/04/21	JLR	Review of three (3) appraisals for each of the five (5) at-issue Receivership Properties in Philadelphia; Compute the average appraised value for each of the five (5) at-issue Receivership Properties and provide the same to K. Crawford.	1.00
10/04/21	CAM	Work on finalizing all four investor metals spreadsheets and start analyzing data for additional reporting, compare three different back-up list for quality check, starting comparing July 30th numbers to September 30th numbers, and start on outlining Receiver's follow-up numbers to report and outlining all objections and proposed responses (.7.5).	7.50
10/04/21	JSS	Communications with Forensics expert regarding images obtained.	.50
10/05/21	AEC	Respond to email from counsel for Joshua Ferdman regarding service.	.20
10/05/21	CAM	Telephone call with attorney for late filed investor and confirm metals and investments and prepare Investor Confirmation form, claim calculation and forward claims package to attorney and investor, log into spreadsheet and document file (1.2); Continue analyzing claims data, objections, and amendments and prepare draft responses to all objections and outline claim numbers for Receiver's reporting (4.5); Started initial review of MagicStar documents and reconciling with bank records from Receiver (1).	6.90
10/05/21	PCL	Communications with K. Crawford, J. Buffa, p. Gomersall, R. Foelber regarding Portfolio online information and comments (.8) communications with F. O'Connor, K. Crawford, et. al., regarding PipeDrive response to Portfolio (T. Scott) objection to document disclosure and related file review (.6); communications with K. Crawford regarding Fainche response (.2).	1.60

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
10/05/21	DW	Reviewed tax notices and letters/appeals to receivership entities; shared documents with K. Crawford and discussed; researched whether Kelly could represent the receivership in Oregon Tax Court; researched the circumstances in which a receiver may be personally liable for tax obligations of a receivership.	4.80
10/06/21	CAM	Adding additional investors and working claims packages and updating all spreadsheets and log sheets (2.1); Finalize Review and analysis of MagicStar Invoices received on Carlos Cruz Production and prepare memo to Receiver on results of same (4); Receive and return calls and emails from additional investors for status of case (.8); Continue review of defendant's documents in DISCO for litigation purposes (.5).	7.40
10/06/21	JSS	Confer with Receiver regarding review of documents obtained from Receivership defendants through computer forensics.	.25
10/06/21	JSS	E-mail communications with California forensics vendor regarding video.	.25
10/06/21	PCL	Communications with A. Bernstein and K. Crawford regarding Bleeden and Kohl issues (.9); communications with F. O'Connor and K. Crawford regarding PipeDrive document request and related file review (.7); communications with B. Gluck and K. Crawford regarding follow-up (.3).	1.90
10/06/21	DW	Oversaw finalization of materials to be sent to the various taxing agencies. Researched more on potential personal liability of a receiver for unpaid taxes.	2.20
10/07/21	CAM	Continue going through Defendant's records searching for documents related to Perez Batshavili (2); telephone call with wife of investor to notify of investor's passing away (.3); Email from MT State requesting additional information on MT investors and respond to same (.8); Work with two additional investors in creating claims packages and updating log sheets and memo to file (2.2); Investigate addresses for claims packages that were returned undeliverable, call/email investors for updated information (1.5).	6.80
10/07/21	PCL	Communications with K. Crawford et. al., regarding Pipe Drive response (.3); communications with C. Hardacre and C. Koonce (.2).	.50
10/07/21	DW	Research on when a receiver might be held personally liable for tax liabilities.	1.60
10/08/21	CAM	Address additional investors who did not file claims and create claims packages and update all log files and document file (2.4); Receive and respond to investor calls and emails updating addresses, getting case status and information on what comes next (1.8).	4.20
10/08/21	PCL	Communications with K. Crawford regarding Motion for Leave response strategy (.5); communication with J. Buffa, K. Crawford and R. Foelber regarding Motion for Leave and related developments (.8); communications with Court schedule (.3).	1.60
10/10/21	PCL	Communications with F. O'Connor and K. Crawford regarding document request.	.20

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
10/11/21	PCL	Communications with S.Thomas, K. Crawford, et al, regarding Cruz deposition in light of stay order(.2); review motion for leave and related communications with K.Crawford regarding response to same and related strategy(.6); communications with D.Baer, J. McClay, K. Crawford regarding 5 property package(.4);communications with C.Koonce and K. Crawford regarding stay order an broker lawsuits(.2); communications with K. Crawford regarding Bleeden settlement proposal(.3); communications with K. Crawford regarding response to Quinn Emanuel discovery demand to CFTC and related file review(.5);communications with K. Crawford regarding Spritzer claim objection(.3)Left message with Michelle regarding motion for leave questions and related docket review and follow up with K. Crawford(.9);review draft of response to motion for leave and related communications with K. Crawford(.5); communications with K. Crawford, J. Keeton, J. Buffa et al regarding Kixie document production(.3); communications with K. Crawford, D. Baer regarding Penn property repairs(.1); communications with F. O'Conner, K. Crawford, et al regarding document request(.3).	4.30
10/12/21	JLR	Receipt of and listen to voicemail from Investor Victim Couple, C. & M. Harris, requesting return call regarding undisclosed Receivership question; Return call with the same.	.50
10/12/21	PCL	Communications with K. Crawford, B. Gluck and T. Douglas regarding Portfolio Insider(.9); communications with K. Crawford regarding stay order and related file review(.5); review Motion for Leave and stay order and related communications with K. Crawford(.5); communications with D. Baer, K. Crawford, J.Hammel, regarding Rhawn property(.3); communications with J.Buffa, R. Foelber, K. Crawford regarding latest developments in in light of the stay(.8).	2.00
10/12/21	PCL	Receipt of email from L. Kuhn regarding intrinio and related communications with K.Crawford regarding inability to respond.	.30
10/12/21	PCL	Communications with F.O'Connor, et al., regarding document request and related file review(.4).	.40
10/14/21	PCL	Communications with K. Crawford, D. Baer regarding ability to close on Rhawn street(.3);review Brannon letter regarding Kyle Sanna.	.40
10/15/21	PCL	Communications with K. Crawford, D.Baer et al., regarding question on ability to close on 827 Rhawn Street(.4); communications with K. Crawford and B. Cluck and/or related file review (.2).	.60
10/18/21	DW	Conference with Kelly; read documents relevant to the motion to hold Receivership Defendants in civil contempt; began researching caselaw on the distinction between civil and criminal contempt in order to reply to the Receivership Defendants Response to our motion for civil contempt.	2.90
10/19/21	PCL	Receipt and review of letter from CFTC to Bradley Arant regarding discovery request and stay issuance.	.30

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
10/19/21	DW	Researched when protections of criminal due process are required in a contempt proceeding ; drafted section of reply arguing that the contempt proceeding we moved for is civil.	2.30
10/20/21	PCL	Review and revise draft response to Reply to Receivers' contempt motion and related file review, related communications with K. Crawford regarding same and pending motions strategy(1.9); communications with K. Crawford, et al., regarding Portfolio Insiders communications with NASDAQ(.4).	2.30
10/20/21	DW	Edited the Reply in support of our motion for civil contempt; added two footnotes and made some minor deletions.	1.00
10/21/21	PCL	Communications with K. Crawford regarding hearing discovery request (.3); review and revise draft reply to defendants' Opposition to Motion to Show Cause and related communications with K. Crawford (1.0).	1.30
10/21/21	PCL	Communications with K. Crawford regarding reply response and related review(.6); communications with K. Crawford regarding T. Scott activities(.4).	1.00
10/22/21	PCL	Continue preparation for hearings on Portfolio Insider; motion for contempt and/or related communications with K. Crawford.	.70
10/22/21	DW	Researched whether Cruz and Portfolio Insider are "affiliates" under the SRO ; researched whether they received adequate due process .	1.50
10/23/21	PCL	Review Portfolio Insider Motion to prevent receiver from recovering Portfolio Insider Assets and related communications with K. Crawford (1.0); communications with K. Crawford, Plaintiff's, et. al., regarding discovery request and need for court order (.4).	1.40
10/25/21	PCL	Communications with K. Crawford, et. al., regarding Portfolio Insider / contempt motions / responses and related review and revisions.	2.20
10/25/21	DW	Researched caselaw that Portfolio Insider and Carlos Cruz can be added as Receivership Defendants and that the Receiver has the duty to report facts to the court that a Receivership Defendant is violating a court order and should be held in contempt .	2.20
10/26/21	PCL	Communications with K. Crawford regarding proposed revisions to response to Portfolio Insider motion and related file review.	.50
10/26/21	DW	Researched case showing that the Receiver should bring a motion for contempt if the receiver discovers court orders are being violated .	.90
10/29/21	DW	Researched whether a receiver's powers continue when the underlying civil case is stayed pending resolution of a criminal proceeding .	.90
11/04/21	PCL	Communications with A. Raimondo and K. Crawford regarding Zack's data issues and related file review.	.90

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
11/04/21	PCL	Communications with K. Crawford regarding pending motions and strategy (.9); communications with D. Wills and K. Crawford regarding evidence, etc.; conduct research needed (.4).	1.30
11/04/21	PCL	Review of Portfolio Insider response and related communications with K. Crawford.	.50
11/08/21	PCL	Communications with K. Crawford regarding status inquiry from potential Receiver witness and related file review.	.30
11/09/21	DW	Begin research regarding the evidentiary standard applicable to receivers and the due process standard for contempt.	.30
11/10/21	PCL	Continue preparation for upcoming contested hearings.	.80
11/10/21	DW	Researched evidentiary issues facing the Receiver such as the need for personal knowledge, authentication, and hearsay; begin drafting memorandum that will address evidentiary issues facing the receiver and issues of due process to hold the Receivership Defendants in contempt.	4.10
11/11/21	DW	Researched and analyzed federal rules of evidence as applied to receivership cases; completed section of the memorandum addressing the rules of evidence.	1.00
11/14/21	PCL	Continue preparation for upcoming hearings on motion for contempt, etc. and related review of D. Wills memo regarding evidence issues.	.90
11/15/21	PCL	Continue pleadings and document review and related preparation/communications with K. Crawford regarding upcoming contempt, et al hearings.	1.00
11/18/21	PCL	Communications with K. Crawford regarding strategy for pending motions.	.40
11/29/21	JLR	Receipt of and listen to voicemail from financial advisor, R. Lamore, of Investor Victim, M. Gary, regarding the potential to make a late claim; Draft and send subsequent email to R. Lamore providing contact information and details of potentially making a late claim.	.25
11/29/21	JLR	Receipt and review of email correspondence from Investor Victim, B. Hunt, requesting status update; Draft and send responsive email to the same providing a status update of the Receivership and claims.	.25
11/29/21	JLR	Receipt of and listen to voicemail from Investor Victim, L. Van Overschelde, requesting information on selling her metals; Answer return call from Investor Victim, L. Van Overschelde, requesting information on selling her metals; Answer those questions as the Receiver cannot opine where to sell.	.25
11/29/21	JLR	Receipt of and listen to voicemail from Investor Victim, K. Dallimore, requesting status update of the Receivership; Return the call of same, provide status update, and answer his questions.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
11/29/21	JLR	Answer return call from Investor Victim, L. Van Overschelde, requesting information on selling her metals; Answer those questions as the Receiver cannot opine where to sell.	.25
11/29/21	JLR	Receipt of responsive email from Investor Victim, B. Hunt, regarding the status update; Draft and send responsive email to the same.	.25
11/29/21	PCL	Communications with D. Baer, K. Crawford, J. McClay regarding case stay status and contracts received.	.40
11/30/21	DW	Drafted the reply to the order issued by the Oregon Tax Court which required reply.	1.70
12/01/21	PCL	Communications with K. Crawford regarding stay impact on service of Defendants in broker lawsuit and related file review.	.40
12/01/21	DW	Conference with secretary regarding filing the response in the Oregon Tax Court.	.30
12/02/21	PCL	Communications with C. Koonce and K. Crawford regarding Motion for Leave.	.20
12/06/21	JLR	Receipt of and listen to multiple voicemails from Investor Victim, D. Burch, requesting status update and address confusion over Interim distribution of monies to Investors pending the stay; Telephone call to D. Burch and answer the same.	.25
12/07/21	PCL	Review and revise draft Motion for Leave pleadings regarding broker lawsuit service deadline extensions and order thereon, revise same and related communications with K. Crawford and/or C. Koonce regarding same and related file review.	1.40
12/08/21	PCL	Communications with K. Crawford, D. Baer and J. McClay regarding the stay status and Philadelphia properties issues and related file review.	.60
12/08/21	PCL	Communications with C. Koonce and K. Crawford regarding Order granting Motion for Leave.	.20
12/09/21	PCL	Draft Motion for Leave regarding Philadelphia properties sale, related file review and communications with K. Crawford regarding same.	1.80
12/10/21	JLR	Answer call from Investor Victim, B. Revere, to address her concerns regarding her claim value and fears over receipt of the same before the holidays/new year; Address the same; Pass to C. Morris for further questioning and details.	.25
12/10/21	PCL	Revise Motion for Leave and/or related communications with K. Crawford (.6); communications with K. Crawford regarding D. Vince email (.2).	.80
12/13/21	PCL	Follow up communications with K. Crawford regarding Motion for Leave regarding Philadelphia properties.	.30

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
12/14/21	JLR	Receipt and review of email correspondence from P. Lewis regarding assistance with filing Receiver's Motion for Leave to File Motion to Sell Remaining Philadelphia Properties; Draft and send responsive email to the same confirming assistance.	.25
12/16/21	PCL	Communications with K. Crawford regarding Motion for Leave regarding Philadelphia properties related for Philadelphia properties.	.40
12/20/21	JLR	Receipt of and listen to multiple voicemails from Investor Victim, L. Minehart, requesting status update as to the Receivership and receipt of his Claim Value; Inform Mr. Minehart of the Court's current stay.	.25
12/20/21	JLR	Receipt and review of two email correspondences from Investor Victim, M. Radney, requesting status update as to the Receivership; Draft and send responsive email correspondence to the same notifying her of the present stay of Receivership.	.25
12/20/21	JLR	Receipt of and listen to voicemail from Investor Victim, C. Snyder, requesting status update as to the Receivership; Return the telephone call of Ms. Snyder; Provide update as to pending Receivership stay.	.25
12/20/21	JLR	Receipt of and listen to two voicemails from Investor Victim, C. Richardson, requesting status of Receivership; Make return calls to the same; Provide status update as to the present Stay of the Receivership.	.50
12/20/21	JLR	Receipt of and listen to voicemail from Investor Victim, M. Peden, requesting status update as to the Receivership; Return the call of same and send subsequent email correspondence providing status update.	.50
12/20/21	JLR	Receipt of and listen to voicemail from Investor Victim, C. Harris, regarding claim status for both M. Harris and his wife's respective claims; Return call.	.25
12/20/21	JLR	Receipt of and listen to voicemail from Investor Victim, D. Burch, requesting call regarding the Receivership; Return the call.	.25
12/20/21	PCL	Communications with D. Baer, K. Crawford, G. Besen and A. Spencer regarding Motion for Leave to file Motion to Sell Philadelphia properties and related drafting and/or revisions of same (1.5); communications with C. Koonce and K. White regarding extension of deadline to response to complaint against D. Ned (.2).	1.70
12/21/21	PCL	Draft / revise / finalize Motion for Leave to file motions to sell Philadelphia properties and related emails to and from Plaintiffs' counsel.	1.50
12/27/21	JLR	Receipt and review of email correspondence from Investor Victim, N. Hyde, providing updated address information; Provide to C. Morris for Receivership records.	.25
12/27/21	JLR	Receipt and review of email correspondence from Investor Victim, M. Radney, regarding status update of the Receivership; Draft and send responsive email to the same.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
12/27/21	JLR	Receipt and review of email correspondence from Investor Victim, R. Kolbow, requesting current status update; Draft and send responsive email to the same providing status of the Receivership.	.25
12/28/21	JLR	Receipt and review of email correspondence from son of deceased Investor Victim, J. Rodriguez, requesting a status update and asking several questions regarding the interim distribution to his Father's Estate; Draft and send responsive email correspondence to the same; Interoffice office email to C. Morris requesting her assistance in answering the Estate questions.	.25
12/28/21	JLR	Receipt of and listen to voicemail from Investor Victim Couple, C. Harris, requesting return call; Return the call of same.	.25
12/29/21	PCL	Communications with V. Northern, K. Crawford, C. Morris regarding Motion for Leave for return of money invested post-receivership and related file review.	.80
12/29/21	DW	Researched whether investor-victims have priority over unsecured creditors in a receivership distribution plan; drafted paragraph for brief summarizing my findings.	2.00
1/05/22	PCL	Communications with J. McClay, D. Baer and K. Crawford regarding 443 Roosevelt offer.	.30
1/06/22	JLR	Answer call from Investor Victim, D. Burch, requesting status update on the Receivership; Provide update.	.25
1/11/22	PCL	Communications with K. Crawford regarding checks received during stay.	.20
1/12/22	JLR	Receipt of and listen to voicemail from Investor Victim, D. Mendenhall, regarding status of the Receivership; Return telephone call.	.25
1/13/22	JLR	Interoffice conference with C. Morris regarding forwarding of Investor Victim related issues to her for review and return of questions.	.25
1/13/22	JLR	Receipt of and listen to two voicemails from Investor Victim, D. Mendenhall, regarding questions and request for status update; Return those calls; Draft and send subsequent email to same providing status update.	.25
1/13/22	JLR	Answer the call of Investor Victim, S. Kelly, to address questions regarding Investor Victim husband, J. Kelly, and S. Kelly's claim and provide status update.	.25
1/13/22	JLR	Receipt and review of email correspondence from Investor Victim, D. Mesch, requesting documentation/status update and updating contact information; Draft and send responsive email correspondence to the same.	.25
1/13/22	JLR	Receipt and review of email correspondence from Investor Victim, J. Ihrke, requesting a Receivership status update; Draft and send responsive email to the same.	.25
1/18/22	JLR	Return call from Investor Victim, D. Mendenhall, regarding questions and request for status update.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
1/18/22	JLR	Receipt of and listen to voicemail from Investor Victim, J. Gearhart, regarding status update and recovery of his claim; Return the call and speak with same.	.25
1/18/22	JLR	Receipt of and listen to voicemail from Investor Victim, D. Neeley, regarding status update; Return the call of same.	.25
1/18/22	PCL	Review Gary Wasden claim letter received from T. Hussin.	.40
1/19/22	JLR	Return call from Investor Victim, D. Mendenhall, regarding questions and request for status update; Spoke with Investor and his wife to address the aforementioned.	.25
1/19/22	JLR	Receipt of and listen to voicemail from Investor Victim, S. McCauley, regarding stay of Receivership and claim status; Return the call of same.	.25
1/19/22	JLR	Receipt of and listen to voicemail from Investor Victim, C. Graffunder, requesting status update.	.25
1/19/22	JLR	Receipt of and listen to voicemail from Investor Victim, B. Buiskool, requesting status update as to the Receivership; Speak with Investor regarding the same.	.25
1/20/22	PCL	Communications with D. Baer, K. Crawford et al., regarding new house bid(s).	.20
1/21/22	JLR	Receipt of and listen to voicemail from Investor Victim, S. Kelly, regarding follow-up question with the Receivership; Return call of same.	.25
1/24/22	JLR	Receipt of and listen to voicemail from Estate of now deceased Investor Victim, W. Eacker, regarding his pending claim in the Receivership; Return call of daughter as Executor of the Estate.	.25
1/24/22	JLR	Receipt and review of email correspondence from daughter of now deceased Investor Victim, W. Eacker, providing updated contact information; Draft and send responsive email to same.	.25
1/25/22	JLR	Receipt of and listen to voicemail from Investor Victim, M. Peden, requesting status update regarding the Receivership and his claim; Return the call of same.	.25
1/26/22	PCL	Communications with K.Crawford and V. Norther regarding S. Austin request for return of funds and related file review.	.50
1/27/22	JLR	Receipt of and listen to voicemail from Investor Victim, D. Burch, regarding Receivership; Return the call of same.	.25
1/28/22	JLR	Receipt of and listen to voicemail from Investor Victim, J. Okraski, requesting status update on the Receivership and questions regarding claim; Return the call of same; Draft and send subsequent email correspondence to the same.	.25
1/31/22	JLR	Receipt of and listen to voicemail from Investor Victim, M. Peden, requesting status update as to the Receivership and his claim; Return the call and send subsequent email correspondence to same.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
1/31/22	JLR	Receipt and review of email correspondence from Investor Victim, P. Rosenbaum, requesting status update; Draft and send responsive email correspondence to the same.	.25
1/31/22	JLR	Receipt of and listen to voicemail from Investor Victim, J. Okraski, regarding need for repeat transmittal of email correspondence with Receivership information; Return the call of same and send requested email correspondence.	.25
1/31/22	PCL	Communications with K.Crawford, V. Northern, et al., regarding turnover funds motion of S. Austin and related file review (.4); communications with K. Crawford and J. Okraski regarding case status (.2).	.60
2/01/22	JLR	Answer call from Investor Victim, M. Peden, regarding frustration with recovery of claim value and stay of Receivership; Interoffice conference with C. Morris to assist in explaining the same to Investor Victim.	.25
2/01/22	JLR	Answer call from Investor Victim, M. Smith, requesting a status update as to the Receivership; Provide the same.	.25
2/01/22	JLR	Answer telephone call from Investor Victim, L. Minehart, requesting status update as to his claim and the Receivership; Answer the same.	.25
2/02/22	JLR	Answer call from Investor Victim, B. Revere, to provide status update and several concerns related to the Receivership; Draft and send subsequent email correspondence to the same providing copy of Complaint and Claim Calculation.	.25
2/02/22	JLR	Receipt of and listen to voicemail from Investor Victim, B. Buiskool; Return the call of same.	.25
2/04/22	JLR	Receipt of and listen to multiple voicemails from Investor Victim, K. Schwab; Return the call of same; Draft and send subsequent mail to Investor providing requested claim information.	.25
2/04/22	PCL	Communications with D. Baer regarding property intruder issue.	.20
2/07/22	PCL	Communications with K. Crawford regarding J. McWright voice mail update .	.30
2/07/22	PCL	Communications with K. Crawford regarding stay status inquiry strategy.	.30
2/08/22	JLR	Receipt and review of multiple email correspondences from Investor Victim, Steve McCauley, regarding request for return of Claim monies.	.25
2/08/22	JLR	Answer call from Investor Victim, C. Harris, regarding status of his and wife Investor, M. Harris, claim in the Receivership; Draft and send subsequent email correspondence to C. Harris providing requested Complaint.	.25
2/08/22	JLR	Receipt of and listen to voicemail from Investor Victim, D. Grady, requesting status update and claim information; Return the call of same.	.25
2/08/22	JLR	Receipt of and listen to voicemail from Investor Victim, B. Buiskool, regarding status of the Receivership and her and her Investor Victim Mother's claim in the Receivership; Return the call of same.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
2/08/22	JLR	Receipt of and listen to voicemail from Investor Victim, K. Perry; Return the call of same.	.25
2/08/22	JLR	Receipt of and listen to voicemail from Investor Victim, E. Kay Beaver, regarding the Receivership; Return the call of same.	.25
2/09/22	JLR	Answer call from Investor Victim, C. Harris, regarding resending of email correspondence with attached Complete; Draft and resend aforementioned email to Investor.	.25
2/09/22	JLR	Receipt and review of email correspondence with attached from local retained counsel, T. Sturgeon, providing copies of Order Dismissing Appeal and Civil Docket in the Commonwealth of Kentucky involving Receivership Defendants.	.25
2/09/22	JLR	Receipt of and listen to voicemail from Investor Victim, C. Savello, requesting status update regarding the Receivership; Return the call of the same.	.25
2/09/22	JLR	Receipt of and listen to subsequent voicemails from Investor Victim, D. Grady, requesting status update and Receivership claim information; Return the call of same.	.25
2/09/22	JLR	Receipt of and listen to voicemail from Investor Victim, J. Siefker, requesting status update regarding the Receivership.	.25
2/09/22	JLR	Receipt of and listen to voicemail from Investor Victim, S. Palmer, regarding Receivership questions; Return the call of same.	.25
2/09/22	PCL	Communications with K.Crawford regarding receipt of Morgan Stanley check.	.20
2/10/22	JLR	Receipt of and listen to voicemail from Investor Victim, A. Reibert, requesting status update; Return the call of same.	.25
2/10/22	JLR	Receipt of and listen to return voicemail from Investor Victim, J. Siefker, requesting status update regarding the Receivership; Return the call of same.	.25
2/10/22	JLR	Return the call of Investor Victim, S. Palmer, regarding questions with his Receivership claim and custodian Entrust.	.25
2/10/22	JLR	Answer return call from Investor Victim, S. Palmer, regarding claim value and custodian Entrust Information; Interoffice conference with Receiver regarding the same.	.25
2/11/22	JLR	Receipt and review of email correspondence from Investor Victim, D. Palmer, regarding Receivership claim and custodian document attachment; Interoffice conference with J. Stafford regarding review of the attachment; Telephone conference with J. Stafford and state of Montana regarding the same.	1.25
2/11/22	JLR	Receipt of and listen to voicemail from Investor Victim, L. Konseck, requesting status update as to the Receivership; Return the call of same.	.25
2/11/22	PCL	Review opinion dismissing broker lawsuit and related communications with K.Crawford.	.80

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
2/13/22	PCL	Continue review of J. Lindsay order dismissing brokers lawsuit.	.60
2/15/22	JLR	Receipt of and listen to voicemail from financial advisor, B. Scott, on behalf of Investor Victim, W. Heims, regarding acceptance of claim status; Research status of respective Investor's claim; Return the call of same.	.25
2/15/22	JLR	Receipt of and listen to voicemail from Investor Victim, D. Neeley, requesting status update; Return the call of same.	.25
2/15/22	PCL	Continue review of Broker Lawsuit and related communications with K.Crawford.	1.30
2/16/22	JLR	Receipt of and listen to voicemail from Investor Victim, M. McKinney, requesting Receivership status update; Return the call of same.	.25
2/16/22	JLR	Receipt of and listen to voicemail from Investor Victim, C. Harney, requesting update on the Receivership; Return the call of same; Draft and send subsequent email correspondence to same providing Receivership claim information.	.25
2/17/22	JLR	Answer call from Investor Victim, M. Peden, regarding Receivership Stay and his claim in the Receivership.	.25
2/17/22	JLR	Answer call from Investor Victim, D. Burch, regarding Receivership Status update.	.25
2/17/22	JLR	Answer call from Lawyer, T. Moss, on behalf of Investor Victim, S. Palmer, regarding Receivership Claim and potential changes to the same; Receipt and review of subsequent email from T. Moss regarding responsive custodian information; Draft and send email correspondence to the same.	1.00
2/17/22	JLR	Receipt of and listen to voicemail from Investor Victim, M. McKinney, regarding the Receivership; Return the call of same.	.25
2/17/22	JLR	Receipt of and listen to voicemail from Investor Victim, B. Garvin, regarding status of the Receivership and his claim; Return the call of same.	.25
2/17/22	CAM	Receive and respond to investors regarding status of case, and discussions with team members regarding status letter to go out and specifics on individual investor issues.	2.50
2/18/22	JLR	Receipt and review of email correspondence from Investor Victim, R. Beatty, requesting status update; Draft and send responsive email to the same.	.25
2/18/22	CAM	Return investor calls regarding status of case (1); conference call with investor D. Stevens regarding claim (.7).	1.70
2/21/22	CAM	Receive and return phone calls from investors regarding status of case.	1.20
2/21/22	PCL	Communications with K. Crawford regarding motion for new trial issues and related file research.	.80
2/22/22	PCL	Communications with K Crawford regarding rights, claims, etc. issues and related file review as to motion for new trial.	.60

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
2/23/22	PCL	Communications with K. Crawford regarding motion for new trial brief and related caselaw research.	1.20
2/24/22	CAM	Receive and respond to investors' calls and emails, and work with several new claimants in getting necessary information.	1.50
2/24/22	PCL	Lengthy communications with K. Crawford, J. Buffa, et. al., regarding response to Judge Lindsay's sua sponte order dismissing the broker lawsuit and related review of motion for new trial.	2.90
2/25/22	CAM	Receive and respond to various investors regarding status of the case and what the stay means.	1.50
2/25/22	PCL	Review of motion for new trial and related research.	1.00
2/27/22	PCL	Continued review of motion for new trial, related research and follow up communications with K. Crawford.	1.50
2/28/22	KEW	Review Custodial Agreement with East West Bank regarding receivership account.	1.50
2/28/22	PCL	Continued review of motion for new trial, related research and follow up communications with K. Crawford.	1.20
2/28/22	PCL	Communications with K. Crawford regarding Motion for New Trial issues and strategy and related review, revisions and/or research.	.80
3/01/22	CAM	Return phone calls from investors related to their claim and notices received of additional investor who recently passed away.	1.50
3/02/22	JLR	Receipt of and listen to voicemail from Investor Victim, S. Derby, regarding what a "stay" means; Return the call and answer same.	.25
3/02/22	JLR	Receipt of and listen to voicemail from Investor Victim, B. Ellison, requesting Receivership status update; Return the call of same.	.25
3/02/22	CAM	Receive and respond to investor emails and phone calls regarding status and changes in contact information.	1.80
3/03/22	CAM	Receive and respond to metals investors on claim information and case status.	1.80
3/03/22	PCL	Review and revise Motion for New Trial, communications with K. Crawford regarding same and related research/file review.	3.50
3/03/22	DW	Researched whether a finding of liability in an underlying case is necessary to find fraudulent intent in an ancillary case.	3.50
3/04/22	CAM	Receive and respond to many metals investors with address changes and provide general case status.	1.20

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
3/04/22	PCL	Review and revise Motion for New Trial, communications with K. Crawford and/or C.Koonce regarding same and related research/file review(1.8); communications with J.McClay, K. Crawford,D. Baer regarding Hunting Park contract status(.2).	2.00
3/05/22	PCL	Communications with K. Crawford and/or C. Koonce regarding motion for new trial and/or related review/research regarding same.	.90
3/07/22	JLR	Answer call from Investor Victim, M. Peden, regarding sale/loan of his Total Recommend Receivership Claim to third-party and incoming fax as to the same.	.25
3/07/22	PCL	Continue review and revisions to motion for new trial, related communications with K. Crawford and related research.	1.80
3/07/22	PCL	Continue review and/or revise Motion for New Trial, related research and communications with K. Crawford regarding same.	2.20
3/07/22	DW	Review and revise the Motion for New Trial.	1.00
3/08/22	JLR	Receipt and review of email correspondence from Investor Victim, L. Lalik, regarding confusion as to New Direction Trust Company and Receivership metals; Draft and send responsive email to the same.	.25
3/08/22	JLR	Receipt of and listen to voicemail from Investor Victim, T. Case, regarding confusion over receipt of the Stay Letter; Return the call of same.	.25
3/10/22	JLR	Receipt of and listen to voicemail from Investor Victim, D. Burch, regarding Receivership Stay; Return the call of same and explain the stay.	.25
3/14/22	JLR	Receipt of and listen to voicemail from Investor Victim, T. Case, regarding correcting identified error in Claim; Return the call of same.	.25
3/16/22	JLR	Answer call from Investor Victim, M. Peden, regarding status of third-party interested in purchasing his Receivership clam and requiring information from the Receiver; Interoffice conference with C. Morris regarding the same.	.25
3/16/22	CAM	Receive and respond to various emails and voicemails from investors on the status of metals case.	1.20
3/17/22	CAM	Receive and respond to newly added metals investors and provide status of case to other investors.	1.50
3/17/22	PCL	Communications with D. Baer regarding status of sale contract approval.	.20
3/21/22	CAM	Receive and respond to investors regarding status of case, as well as spending time with two newly added investors who just learned of the case.	.80
3/22/22	CAM	Communicate with additional investors on status of case.	.90
3/23/22	JLR	Answer call from Investor Victim, D. Burch, to address frustration over Receivership Stay Order; Address the same.	.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
3/28/22	JSS	Telephone conference with L. Sloves (forensics expert) regarding transfer of data to physical drives.	.25
3/29/22	CAM	Review all newly added investors and organize same for entering into the Receiver's final claims report (.5); meet with L. Thompson on status of new investor claims (.5).	2.00
3/30/22	CAM	Review and input all added claims into database and receiver's final report detail report (1.8).	1.80
3/31/22	JSS	Draft Receiver's 7th Status Report to the California District Court.	.25
4/08/22	JLR	Answer call from Investor Victim, D. Burch, requesting status update as to Receivership and address concerns over the length of the Court's stay.	.25
4/12/22	JLR	Receipt of and listen to voicemail from Investor Victim, K. Tomshek, requesting Receivership status for non-metals update; Return the call of same.	.25
4/12/22	JLR	Receipt of and listen to voicemail from Investor Victim, M. Peden, regarding question as to Receivership Claim value/confusion over market variability; Return the call of same.	.25
4/12/22	JLR	Receipt of and listen to voicemail from Investor Victim, M. Hughes, regarding the Receivership status; Return the call of same and draft and send subsequent email to Investor Victim.	.25
4/12/22	JLR	Interoffice conference with K. Crawford regarding specifics of an Investor Victim Call, B. Hunt; Return the call of Investor Victim, B. Hunt, to answer withdrawal questions.	.25
4/13/22	JLR	Receipt of and listen to voicemail from Investor Victim, R. Stearns, asking if she can sell her metals pending the Receivership; Return the call of same.	.25
4/19/22	CAM	Receive and respond to investors and the status of the metals case.	1.20
4/19/22	PCL	Communications with K.Crawford regarding motion for appointment of appraiser regarding Rosemar property and related case developments.	.60
4/19/22	PCL	Communications with K. Crawford regarding motion for leave order from J.Lindsay, filing of notice of withdrawal of motion for leave as to 9 properties and related file review.	.70
4/20/22	JLR	Receipt of and listen to voicemail from Investor Victim, D. Burch, requesting Receivership status update.	.25
4/20/22	CAM	Receive and respond to all investors who requested address updates and update all databases (1.2); receive, review, analyze and enter six newly added investors and forward claim calculations to the investors and update the final reporting numbers for all (4.5).	5.50
4/20/22	PCL	Communications with D.Baer, K.Crawford regarding Rosemar property.	.40

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
4/20/22	PCL	Communications with K. Crawford regarding show cause orders and related developments and related file and/or docket review.	1.20
4/21/22	JLR	Receipt and review of email correspondences with K. Crawford and C. Morris regarding Rosemar Receivership property and notice of the same; Interoffice conference with C. Morris regarding the same.	.50
4/21/22	JLR	Receipt of and listen to voicemail from Investor Victim, M. Peden, requesting Receivership status update and questions; Return the call of same.	.25
4/21/22	JLR	Receipt of and listen to voicemail from Investor Victim, S. McCauley, regarding Receivership Claim; Return the call of same.	.25
4/21/22	CAM	Continue updating newly added investors who recently learned of the metals.com receivership and enter all data and forward claim calculations after adding and updating reporting numbers (2.5); prepare Notice of Sale for publication of the real property located at Rosemar in Philadelphia (.5).	3.00
4/22/22	CAM	Emails to and from Philadelphia Inquirer regarding publishing notice of sale of real property located on Rosemar in Philadelphia and arrange for publication for April 25-27 (.8); review all calls on the Receiver's voicemail and return all that have not been responded to and create log sheet of all callers (2.1); add additional investor to the claims and update all spreadsheets, and prepare calculations and update final totals and forward claim calculations to the investor (1.2).	4.10
4/22/22	PCL	Communications with K.Crawford regarding service of show cause order in BOA litigation.	.20
4/25/22	JLR	Receipt and review of email correspondence from Investor Victim Couple, M. and K. Smith, requesting Receivership update and distribution questions; Draft and send responsive email to the same.	.25
4/25/22	JLR	Receipt of and listen to voicemail from Investor Victim Couple, M. and K. Smith, regarding adding his wife to his Receivership claim; Return the call of same.	.25
4/25/22	JLR	Receipt of and listen to voicemail from Investor Victim, T. Corum, regarding Receivership status update; Return the call of same.	.25
4/25/22	JLR	Receipt of and listen to voicemail from Investor Victim, P. Porter, regarding Receivership questions; Send subsequent email correspondence to the same with the attached requested stay letter.	.25
4/25/22	CAM	Review all final reporting numbers for Receiver's final report on added, amended, corrected claims and add all spreadsheets to come up with total numbers of claim categories, and examine to find the source of numbers discrepancies (3); follow-up with investors on added claims in metals.com receivership and add to totals for reporting purposes (1.1).	4.10
4/25/22	PCL	Communications with K. Crawford regarding case status and developments.	.50

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Atty	Description	Hours
4/27/22	JLR	Answer call from Investor Victim, D. Burch, regarding the Receivership Stay lifting and providing new point of contact; Schedule follow-up call tomorrow 4/28.	.25
4/27/22	PCL	Communications with D. Baer and K. Crawford regarding squatter in Chew property and related utility bills issues.	.20
4/28/22	JLR	Answer call from Investor Victim, D. Burch, regarding new point of Receivership contact.	.25
4/28/22	PCL	Communications with K. Crawford regarding Portfolio Insider counsel's withdrawal motion.	.20
4/28/22	PCL	Conference call with D. Baer, K. Crawford, J. McClay regarding Philadelphia properties status and issues.	1.00
4/29/22	CAM	Contact PECO for real property located on Chew Avenue to have service canceled due to squatters and report same to Receiver (.3); telephone call with G. Johnson of the California Tax Department on their claim and the general status of case (.2); telephone call with K. Kendall of CA Franchise Tax Board on their newly added claim and add to the creditor database (.6); review utility bills received for real property in Philadelphia and forward to L. Thompson for payment (.2); receive and respond to investors regarding status of the case and where we go from here (.8).	2.10
4/29/22	PCL	Communications with K. Crawford regarding Portfolio Insider counsel's withdrawal motion and related file review.	.50

TOTAL PROFESSIONAL SERVICES**\$ 156,622.75**

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
David Wills	57.90	225.00	13,027.50
Priya K. Jesani	1.70	300.00	510.00
Andrea Elizabeth Cook	25.45	320.00	8,144.00
Walker S. Young	2.80	265.00	742.00
Becca Skupin	4.00	265.00	1,060.00
Mark Simon	.40	435.00	174.00
Jessica L. Rolls	108.25	225.00	24,356.25
Cynthia A. Morris	303.15	125.00	37,893.75
James Stafford	6.50	400.00	2,600.00
Katherine Whitlock	1.50	225.00	337.50
Alicia Echavarria	34.75	125.00	4,343.75
Peter Lewis	143.60	440.00	63,184.00
Avi Steinberg	4.50	75.00	337.50
Total	694.50		\$ 156,710.25

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

COSTS ADVANCED

Date	Description	Amount
7/27/21	Courier service (670) Special Delivery Service, Inc.	38.70
7/28/21	Courier service, Special Delivery Service, Inc., 8/7/2021, 646416	233.50
8/02/21	Google suite subscription (bkc firm cc)	252.00
8/03/21	FedEx Delivery	23.88
8/03/21	FedEx Delivery	61.82
8/04/21	FedEx Delivery	21.60
8/04/21	FedEx Delivery	14.28
8/04/21	FedEx Delivery	14.28
8/05/21	FedEx Delivery	14.28
8/07/21	Microsoft- Monthly Subscription (bkc firm cc)	250.00
8/09/21	FedEx Delivery	27.53
8/12/21	FedEx Delivery	39.63
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	12.45
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	19.03
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	15.64
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	19.03
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	42.43
8/13/21	FedEx Delivery	37.03
8/13/21	FedEx Delivery	30.81
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	24.43
8/13/21	FedEx Delivery	21.04
8/13/21	FedEx Delivery	19.84
8/16/21	FedEx Delivery	18.94
8/16/21	FedEx Delivery	24.31
8/16/21	Postage*	1.02
8/16/21	Postage*	2.20
8/17/21	FedEx Delivery	12.39
8/18/21	FedEx Delivery	36.93

APP00064

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Description	Amount
8/18/21	FedEx Delivery	34.08
8/19/21	FedEx Delivery	29.25
8/19/21	Postage*	.51
8/20/21	Postage*	.51
8/23/21	Postage*	8.25
8/24/21	Document Services- EDD HOSTING, Computer Forensic Services,, 8/24/2021, 5064	594.20
8/25/21	FedEx Delivery	42.52
8/25/21	Filing fee, Meter inspection for real property at 404 N. Wanamaker, Philadelphia, Morris/Cynthia, 08/25/2021, WE 082521 000137307	100.00
8/26/21	BKC CC- Renewal: metals receivership domain	41.99
8/26/21	FedEx Delivery	23.41
8/27/21	Courier service	27.25
8/27/21	FedEx Delivery	23.88
8/31/21	Filing fee, Meter re-inspection after repairs for real property at 404 N. Wanamaker, Philadelphia, Morris/Cynthia, 08/31/2021, WE 083121 000137308	100.00
9/01/21	FedEx Delivery	23.31
9/02/21	BKC CC- Online Storage Subscription JS3	252.00
9/02/21	FedEx Delivery	29.12
9/02/21	FedEx Delivery	50.37
9/03/21	FedEx Delivery	39.97
9/05/21	Document Services, Computer Forensic Services,, 9/5/2021, 5124	661.85
9/05/21	Document Services, Data Hosting, 09/05/2021, 5124	661.85
9/06/21	BKC CC- Recurring Microsoft Subscription for Metals	250.00
9/10/21	Computerized legal research	122.70
9/13/21	Renewal	66.09
9/13/21	Filing Clawbacks	402.00
9/20/21	FedEx Delivery	56.36
9/30/21	Filing fee, Pacer Service Center, 10/10/2021, 2639662-Q32021	4.00
10/01/21	FedEx Delivery	161.75
10/03/21	BKC CC - Online Storage Subscription JS3	252.00
10/04/21	FedEx Delivery	24.10
10/06/21	BKC CC - Recurring Microsoft Subscription for Metals	100.00
10/06/21	FedEx Delivery	29.52
10/07/21	BKC CC - Recurring Microsoft Subscription for Metals	150.00
10/10/21	Document Services, 16125.102- Document Services, Computer Forensic Services,, 10/10/2021, 5185	3,416.81
10/13/21	Computerized legal research westlaw	488.15
10/22/21	FedEx Delivery	15.13
10/23/21	Document Services Pacer document search: 36 pages x .10 = \$3.60	3.60
11/01/21	Online Storage Subscription JS3 - (BKC Firm CC)	252.00
11/01/21	Document Services, Computer Forensic Services, Inc. Invoice 5245 11.01.2021, Computer Forensic Services,, 11/01/2021, 5245	594.20
11/02/21	Postage*	.53
11/04/21	Document Services Pacer document search: 163 pages x .10 = \$16.30	16.30
11/06/21	Recurring Microsoft Subscription - (BKC Firm CC)	100.00
11/07/21	Recurring Microsoft Subscription for Metals - (BKC Firm CC)	150.00
11/09/21	Postage	1.06

APP00065

SCHEEF & STONE, LLP

Invoice: 109213

May 5, 2022

Date	Description	Amount
11/30/21	FedEx Delivery	15.30
12/01/21	Online Storage Subscription JS3- BKC Firm CC	252.00
12/05/21	Document Services, Computer Forensic Services, Inc., Computer Forensic Services,, 12/05/2021, 5291	594.20
12/06/21	Recurring Microsoft Subscription for Metals - BKC Firm CC	250.00
12/30/21	Document Services Pacer document search: 37 pages x .10 = \$3.70	3.70
12/31/21	Filing fee, Pacer Service Center, 1/6/2022, 2639662-Q42021	15.00
1/03/22	Document Services, Computer Forensic Services, Inc., Computer Forensic Services,, 01/03/2022, 5337	729.51
1/07/22	Dropbox Metals - KMC Firm CC	127.79
2/09/22	2 Courier service, Federal Express, 2/16/2022, 7-662-53829	38.48
2/09/22	Courier service, Federal Express, 2/16/2022, 7-662-53829	31.92
4/29/22	Courier service, Federal Express, 5/4/2022, 7-744-54608	25.60
TOTAL COSTS ADVANCED		\$ 13,179.59

APP00066

**Brown Fox PLLC**

8111 Preston Road, Suite 300

Dallas, Texas 75225

Phone: (214) 327-5000

Fax: (214) 327-5001

INVOICE

Invoice # 26801

Date: 09/10/2021

Kelly Crawford
Receiver
Scheef & Stone
500 North Akard Street, Suite 2700
Dallas, Texas 75201

Statement of Account

For professional fees and expenses incurred.

Kelly Crawford v. Walter Vera , et al.

Date	Initials	Description	Hours	Rate	Total
08/12/2021	CCK	Continue drafting Receiver's Original Complaint against Broker Defendants.	6.70	\$425.00	\$2,847.50
08/13/2021	CCK	Continue drafting and editing Receiver's Original Complaint against Broker Defendants; brief telephone conference with K. Crawford regarding potential limitations issues for these and similar claims research regarding California limitations UFTA claims.	2.00	\$425.00	\$850.00
08/20/2021	CCK	Telephone conference with Receiver regarding facts for inclusion in Broker complaint and strategy regarding same.	0.20	\$425.00	\$85.00

Quantity Subtotal 8.9

Subtotal \$3,782.50

Bank of America Subpoena

Date	Initials	Description	Hours	Rate	Total
------	----------	-------------	-------	------	-------



08/11/2021	CCT	Correspondence with receiver regarding additional records needed from Bank of America; correspondence with counsel to Bank of America regarding same.	0.20	\$405.00	\$81.00
------------	-----	---	------	----------	---------

08/16/2021	CCT	Correspondence with counsel to BOA regarding requested supplemental production; correspondence with Receiver regarding same.	0.10	\$405.00	\$40.50
------------	-----	--	------	----------	---------

Quantity Subtotal	0.3
--------------------------	------------

Subtotal	\$121.50
-----------------	-----------------

Hours Total	9.2
--------------------	------------

Subtotal	\$3,904.00
-----------------	-------------------

Total	\$3,904.00
--------------	-------------------

Current Statement payable upon receipt and due within 30 days.

Federal Tax ID 61-1764390

**Brown Fox PLLC**

8111 Preston Road, Suite 300

Dallas, Texas 75225

Phone: (214) 327-5000

Fax: (214) 327-5001

INVOICE

Invoice # 27235

Date: 10/11/2021

Kelly Crawford
Receiver
Scheef & Stone
500 North Akard Street, Suite 2700
Dallas, Texas 75201

Statement of Account

For professional fees and expenses incurred.

Metals.com and Barrick Capital Receivership

Date	Initials	Description	Hours	Rate	Total
09/16/2021	CCK	Telephone conference with Receiver regarding strategy related to discovery from and a lawsuit against entity that received multiple millions of dollars from the defendant entities and has operated in concert with Defendants.	0.40	\$425.00	\$170.00
09/23/2021	CCK	Strategy discussion with Receiver regarding persons and entities against whom claims may be asserted regarding specific transfers and activities, good faith basis for same, etc.	0.20	\$425.00	\$85.00
			Quantity Subtotal		0.6
			Subtotal		\$255.00

Kelly Crawford v. Walter Vera , et al.

Date	Initials	Description	Hours	Rate	Total
09/08/2021	CCT	Review working draft of complaint; correspondence with C. Koonce regarding same.	0.40	\$405.00	\$162.00

09/09/2021	CCK	Review Receiver's edits to draft Complaint and further revisions to same; confer with Receiver regarding remaining questions and information to include; forward redline and clean version for Receiver's review, with lengthy email regarding adding detail.	3.60	\$425.00	\$1,530.00
09/09/2021	CCT	Conference with C. Koonce regarding working draft of complaint; correspondence with Receiver regarding same.	0.40	\$405.00	\$162.00
09/13/2021	CCK	Review edits and confer with Receiver regarding strategy regarding [REDACTED] [REDACTED]	1.20	\$425.00	\$510.00
09/14/2021	CCK	Review filed Complaint [no charge]; confer with Receiver regarding requesting reassignment from Scholer's court to Lindsay's; calendar calling chambers regarding reassignment if not done automatically.	0.20	\$425.00	\$85.00
09/16/2021	CCK	Confer with Receiver regarding filing notice of related case, status of summons, etc.; review and revise notice of related case.	0.20	\$425.00	\$85.00
09/16/2021	CCT	Correspondence with C. Koonce regarding need for certificate of interested persons, notice of related case, and issuance of summons; correspondence with Receiver regarding same.	0.20	\$0.00	\$0.00
09/21/2021	CCK	Review and recommend change to cert of interested persons and provide status regarding strategy for requesting reassignment.	0.20	\$425.00	\$85.00
09/21/2021	CCK	Telephone conference with counsel for Walter Vera regarding request for discovery, negotiations/factual contentions underlying fraudulent transfer claim against his client, etc.; provide update regarding same to Receiver.	1.10	\$425.00	\$467.50
09/22/2021	CCK	Call Judge Scholer's chambers regarding reassignment.	0.20	\$425.00	\$85.00
09/28/2021	CCK	Review email from counsel for Deric Ned defendants and schedule call; discuss case with Ned's counsel and agree to waiver; confer with Receiver regarding additional information.	0.40	\$425.00	\$170.00
09/29/2021	CCK	Review waivers of service for 3 defendants and respond to attorney who requested them; email Receiver regarding strategy for managing status of each defendant, including discovery and related	0.50	\$425.00	\$212.50

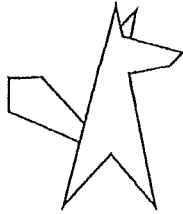
matters; telephone conference with Receiver regarding strategy related to [REDACTED]
 [REDACTED] respond to email regarding same from Defendant's counsel.

Quantity Subtotal 8.6

Subtotal \$3,554.00

Bank of America Subpoena

Date	Initials	Description	Hours	Rate	Total
09/23/2021	CCT	Review order setting hearing on motions to show cause; correspondence with Receiver regarding same; correspondence with counsel to Bank of America regarding same.	0.30	\$405.00	\$121.50
09/24/2021	CCT	Telephone conference with E. Moeller (counsel to Bank of America) regarding order on show cause motion; correspondence K. Crawford regarding same.	0.20	\$405.00	\$81.00
09/29/2021	CCT	Review order setting show cause hearing; correspondence with Receiver regarding same; correspondence with E. Moeller regarding same; conference with counsel regarding same.	0.40	\$405.00	\$162.00
			Quantity Subtotal		0.9
			Subtotal		\$364.50
			Hours Total		10.1
			Subtotal		\$4,173.50
			Total		\$4,173.50

**Brown Fox PLLC**

8111 Preston Road, Suite 300

Dallas, Texas 75225

Phone: (214) 327-5000

Fax: (214) 327-5001

INVOICE

Invoice # 27743

Date: 11/09/2021

Kelly Crawford
Receiver
Scheef & Stone
500 North Akard Street, Suite 2700
Dallas, Texas 75201

Statement of Account

for professional fees and expenses incurred.

General Legal Advice

Date	Initials	Description	Hours	Rate	Total
10/06/2021	CCT	Correspondence with Receiver regarding order staying case and [REDACTED]	0.40	\$405.00	\$162.00
			Quantity Subtotal		0.4
			Subtotal		\$162.00

Metals.com and Barrick Capital Receivership

Date	Initials	Description	Hours	Rate	Total
10/18/2021	CCK	Telephone conference with K. Crawford regarding strategy for his reply in support of Motion to Show Cause related to Portfolio Insider activities.	0.20	\$425.00	\$85.00
10/19/2021	CCK	Review Receiver's Motion to Show Cause and Response filed by Defendants in anticipation of reviewing and editing Reply in Support of Motion to Show Cause.	1.00	\$425.00	\$425.00

10/20/2021	CCK	Review and revise Receiver's Reply in Support of Motion to Show Cause; telephone conference with K. Crawford regarding same and strategy for hearing.	1.00	\$425.00	\$425.00
Quantity Subtotal					2.2
Subtotal					\$935.00

Kelly Crawford v. Walter Vera , et al.

Date	Initials	Description	Hours	Rate	Total
10/12/2021	CCK	Telephone conference with K. Crawford regarding recent orders in underlying case and strategy regarding same.	0.20	\$425.00	\$85.00
10/13/2021	CCK	Telephone conference with counsel for Kyle Sanna regarding his request to discuss settlement and waiver of service.	0.40	\$425.00	\$170.00
Quantity Subtotal					0.6
Subtotal					\$255.00

Bank of America Subpoena

Date	Initials	Description	Hours	Rate	Total
10/04/2021	CCT	Correspondence with E. Moeller regarding show cause hearing.	0.20	\$405.00	\$81.00
10/05/2021	CCT	Telephone conference with E. Moeller regarding upcoming hearing on motions to show cause; correspondence with Receiver regarding same.	0.50	\$405.00	\$202.50
Quantity Subtotal					0.7
Subtotal					\$283.50
Hours Total					3.9
Subtotal					\$1,635.50
Total					\$1,635.50

**Brown Fox PLLC**

8111 Preston Road, Suite 300
 Dallas, Texas 75225
 Phone: (214) 327-5000
 Fax: (214) 327-5001

INVOICE

Invoice # 28208
 Date: 12/09/2021

Kelly Crawford
 Receiver
 Scheef & Stone
 500 North Akard Street, Suite 2700
 Dallas, Texas 75201

Statement of Account

For professional fees and expenses incurred.

Kelly Crawford v. Walter Vera , et al.

Date	Initials	Description	Hours	Rate	Total
11/10/2021	CCK	Telephone conference w/counsel for D. Ned regarding requested extension and related matters in underlying lawsuit; confer with K. Crawford regarding same, calculate deadline for service on all defendants; and confer with D. Ned's counsel regarding extension.	0.40	\$425.00	\$170.00
11/11/2021	CCK	Email exchanges with counsel for D. Ned and Receiver regarding prior settlement discussions.	0.20	\$425.00	\$85.00
11/12/2021	CCK	Email exchanges with counsel for D. Ned regarding settlement.	0.20	\$425.00	\$85.00
			Quantity Subtotal		0.8
			Hours Total		0.8
			Subtotal		\$340.00
			Total		\$340.00

**Brown Fox PLLC**

8111 Preston Road, Suite 300

Dallas, Texas 75225

Phone: (214) 327-5000

Fax: (214) 327-5001

INVOICE

Invoice # 28807

Date: 02/02/2022

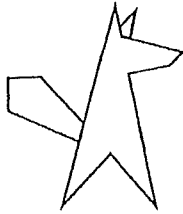
Kelly Crawford
Receiver
Scheef & Stone
500 North Akard Street, Suite 2700
Dallas, Texas 75201

Statement of Account

for professional fees and expenses incurred.

Kelly Crawford v. Walter Vera , et al.

Date	Initials	Description	Hours	Rate	Total
12/01/2021	CCK	Telephone conference with K. Crawford regarding preparing and filing motion to extend deadline to serve all defendants.	0.20	\$425.00	\$85.00
12/03/2021	CCK	Draft motion for leave to file and motion for extension of time to serve all defendants; forward same to K. Crawford; confer with assistant regarding preparing draft orders.	0.80	\$425.00	\$340.00
12/07/2021	CCK	Review PCL edits to motion for leave; emails regarding same and conform.	0.30	\$425.00	\$127.50
12/13/2021	CCK	Brief review of K. Sana's answer.	0.20	\$425.00	\$85.00
12/20/2021	CCK	Telephone conference with counsel for D. Ned regarding request for further extension to answer/respond; respond to email confirming same.	0.30	\$425.00	\$127.50
			Quantity Subtotal		1.8
			Hours Total		1.8
			Subtotal		\$765.00

**Brown Fox PLLC**

8111 Preston Road, Suite 300

Dallas, Texas 75225

Phone: (214) 327-5000

Fax: (214) 327-5001

INVOICE

Invoice # 29292

Date: 03/03/2022

Kelly Crawford
Receiver
Scheef & Stone
500 North Akard Street, Suite 2700
Dallas, Texas 75201

Statement of Account

For professional fees and expenses incurred.

Kelly Crawford v. Walter Vera , et al.

Date	Initials	Description	Hours	Rate	Total
02/04/2022	CCK	Review email from counsel for D. Ned regarding further extension to answer while underlying case is stayed; confer with K. Crawford regarding same and email D. Ned's counsel regarding agreement that he answer 21 days after court lifts the stay.	0.20	\$435.00	\$87.00
02/10/2022	CCK	Review memorandum opinion and judgment dismissing claim; research regarding [REDACTED] [REDACTED] telephone conference with K. Crawford regarding strategy for addressing order and judgment.	0.50	\$435.00	\$217.50
02/11/2022	CCK	Research regarding [REDACTED] [REDACTED] with K. Crawford regarding same; review appellate timetable given impending Motion for New Trial.	0.60	\$435.00	\$261.00
02/14/2022	CCK	Telephone conference with K. Crawford regarding strategy for challenging dismissal; research regarding cases supporting various arguments in support of same.	0.80	\$435.00	\$348.00

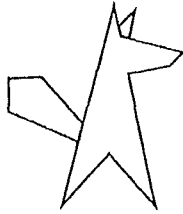
02/15/2022	CCK	Begin drafting Motion for New Trial, building on draft/outline provided by K. Crawford and confer with K. Crawford regarding same; research regarding authorities demonstrating ancillary jurisdiction.	2.70	\$435.00	\$1,174.50
02/16/2022	CCK	Continue drafting Motion for New Trial, including research for authorities regarding [REDACTED]	4.70	\$435.00	\$2,044.50
02/17/2022	CCK	Continue drafting Motion for New Trial.	2.00	\$435.00	\$870.00
02/18/2022	CCK	Confer with K. Crawford regarding discussion of issues related to Underlying Lawsuit in Motion for New Trial and continue drafting same; forward draft to K. Crawford; conference with NAFER board members regarding potential amicus brief in support of motion for new trial.	2.40	\$435.00	\$1,044.00
02/20/2022	CCK	Review K. Crawford edits and continue drafting Motion for New Trial.	3.10	\$435.00	\$1,348.50
02/21/2022	CCK	Conference with K. Crawford regarding latest version of the Motion for New Trial and brief review of same.	0.30	\$435.00	\$130.50
02/22/2022	CCK	Review edits received from K. Crawford and continue drafting Motion for New Trial adding comments and additional authorities, particularly addressing merits vs ripeness, Scholes discussion, and evidence supporting fraudulent intent.	2.60	\$435.00	\$1,131.00

Quantity Subtotal 19.9

Hours Total 19.9

Subtotal \$8,656.50

Total \$8,656.50

**Brown Fox PLLC**

8111 Preston Road, Suite 300
 Dallas, Texas 75225
 Phone: (214) 327-5000
 Fax: (214) 327-5001

INVOICE

Invoice # 29663
 Date: 04/06/2022

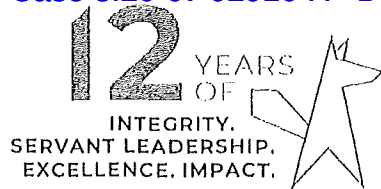
Kelly Crawford
 Receiver
 Scheef & Stone
 500 North Akard Street, Suite 2700
 Dallas, Texas 75201

Statement of Account

for professional fees and expenses incurred.

Kelly Crawford v. Walter Vera , et al.

Date	Initials	Description	Hours	Rate	Total
03/06/2022	CCK	Review further edited Motion for New Trial, and extensive edits to same; email conference with K. Crawford regarding same.	2.10	\$435.00	\$913.50
03/07/2022	CCT	Review working draft of Motion for New Trial; correspondence with Receiver and C. Koonce regarding same.	0.90	\$405.00	\$364.50
03/14/2022	CCK	Confer with K. Crawford regarding timing for court to rule on Motion for New Trial, and strategy related to additional claims and stay in underlying lawsuit.	0.30	\$435.00	\$130.50
Quantity Subtotal					3.3
Hours Total					3.3
Subtotal					\$1,408.50
Total					\$1,408.50



Brown Fox PLLC
Billing Department
8111 Preston Road, Suite 300
Dallas, Texas 75225
Telephone: 214-327-5000
Fax: 214-327-5001

INVOICE

Invoice # 30033
Date: 05/04/2022

Kelly Crawford
Receiver
Scheef & Stone
500 North Akard Street, Suite 2700
Dallas, Texas 75201

Statement of Account

For professional fees and expenses incurred.

Metals.com and Barrick Capital Receivership

Date	Initials	Description	Hours	Rate	Total
04/18/2022	CCT	Telephone conferences and correspondence with Judge Lindsay's chambers regarding status of receivership; telephone conferences with K. Crawford and C. Koonce regarding same.	0.90	\$405.00	\$364.50
04/19/2022	CCT	Telephone conferences with chambers regarding pending motions; telephone conference with Receiver regarding same; correspondence with counsel to BOA regarding acceptance of service.	0.50	\$405.00	\$202.50
04/20/2022	CCT	Draft Notice of Acceptance of Service; correspondence with Receiver regarding same; coordinate filing of same; correspondence with E. Moeller regarding same; telephone conference with chambers regarding status of receivership; telephone conference with Receiver regarding same.	0.90	\$405.00	\$364.50
04/22/2022	CCT	Telephone conference with chambers regarding outstanding receivership issues.	0.30	\$405.00	\$121.50
Quantity Subtotal					2.6

Subtotal \$1,053.00

Kelly Crawford v. Walter Vera , et al.

Date	Initials	Description	Hours	Rate	Total
04/18/2022	CCK	Telephone conference with C. Thomas and K. Crawford regarding status update and related questions.	0.20	\$435.00	\$87.00
04/19/2022	CCK	Confer with C. Thomas and K. Crawford regarding [REDACTED] and research for additional authorities regarding same.	0.50	\$435.00	\$217.50
Quantity Subtotal					0.7
Subtotal					\$304.50
Hours Total					3.3
Subtotal					\$1,357.50
Total					\$1,357.50



P.O. Box 70087
Louisville, KY 40270-0087
(502) 589-5400
Facsimile (502) 581-1087
www.frostbrowntodd.com

Kelly Crawford
500 North Akard Street, Suite 2700
Dallas, TX 75201

Fed # 61-0722001
September 14, 2021
Bill # 210230548
Account # 0148401.0748198

Reference: n/a
RE: Local Counsel

For Professional Services Rendered Through August 31, 2021	2,966.00
Other Charges Through August 31, 2021	126.46
TOTAL THIS BILL:	3,092.46

All amounts are in USD

Please send remittance information to AccountsReceivable@FBTLaw.com

Wire Transfer Information:

Account Name: Frost Brown Todd LLC

Bank Name: US Bank, 425 Walnut Street, Cincinnati, OH 45202

Account Number: 821609195 – Routing Number: 042000013 – Swift Number: USBKUS44IMT

APP00081



Account 0148401.0748198

Page 2

Date	Tmkr	Narrative	Hours	Amount
08/25/21	GT	Participate in conference call re need to file receivership and stay orders with Kentucky Court of Appeals; analyze trial court draft of Notice of Receivership and Related Stay and exhibits including complaint and multiple orders; telephone conference with K. Morgan at Kentucky Court of Appeals.	1.00	550.00
08/26/21	GT	Telephone conference with Court of Appeals staff; telephone conference with J. Stafford and J. Roll re filings suggested by Court of Appeals; revise draft trial court filing to reflect proper exhibits and for filing with Court of Appeals.	1.20	660.00
08/27/21	ATS	Review and revise filings, corresponding with M. O'Grady regarding same; circulate proposed filings to J. Stafford and J. Rolls.	0.50	192.50
08/27/21	MCO	Prepare entry of appearance for G. Sumner and T. Sturgeon then forward to G. Sumner for review.	0.80	200.00
08/27/21	MCO	Revise Notice of Receivership then forward to G. Sumner for review.	0.40	100.00
08/27/21	MCO	Revisions to Notice of Receivership and Entry of Appearance then forward to T. Sturgeon.	0.20	50.00
08/27/21	GT	Attention to further revisions to Notice of Receivership and Stay; attention to Entry of Appearance; emails with J. Stafford and J. Roll re same; confer with T. Sturgeon re same.	0.60	330.00
08/30/21	ATS	Correspond with G. Terry Sumner regarding communications with adverse counsel; email M. Valenti regarding scheduling call; participate on call with G. Terry Sumner, J. Rolls, and J. Stafford regarding upcoming calls; receive update from G. Terry Sumner regarding call with Breetz and national counsel for New Direction Trust.	0.30	115.50
08/30/21	GT	Communications with J. Stafford re conversations with counsel for New Direction Trust; participate in conference call with counsel for New Direction Trust re filing of stay-related pleadings with appellate court; attention to finalizing and filing Notice of Receivership and Stay with Kentucky Court of Appeals.	0.70	385.00

Account 0148401.0748198

Page 3

Date	Tmkr	Narrative	Hours	Amount
08/30/21	MCO	Email to S. Ayers with Notice of Receivership and Entry of Appearance for filing with the Court.	0.30	75.00
08/31/21	ATS	Email M. Valenti with copies of the pleadings; review voice mail from M. Valenti and forward same to J. Stafford; respond to M. Valenti and schedule call; participate on call with M. Valenti and J. Sheets, with M. Valenti expressing potential objections; follow up call with J. Sheets.	0.80	308.00
Total:			6.80	\$2,966.00

ITEMIZED DISBURSEMENTS

Date	Description	Amount
08/31/21	Postage Postage	1.46
TOTAL		\$1.46

SUMMARIZED DISBURSEMENTS

Description	Qty	Per Unit	Amount
Reproduction	1,020.00	0.10	102.00
Color Copies	50.00	0.30	15.00
Tabs	40.00	0.20	8.00
TOTAL			\$125.00



P.O. Box 70087
Louisville, KY 40270-0087
(502) 589-5400
Facsimile (502) 581-1087
www.frostbrowntodd.com

Kelly Crawford
500 North Akard Street, Suite 2700
Dallas, TX 75201

Fed # 61-0722001
October 14, 2021
Bill # 210237151
Account # 0148401.0748198

Reference: n/a
RE: Local Counsel

For Professional Services Rendered Through September 30, 2021	242.00
Other Charges Through September 30, 2021	13.21

TOTAL THIS BILL:	255.21
-------------------------	---------------

Outstanding Bills (see page 2 for details – if already paid please disregard)	3,092.46
---	----------

TOTAL AMOUNT DUE:	3,347.67
--------------------------	-----------------

All amounts are in USD

Please send remittance information to AccountsReceivable@FBTLaw.com

Wire Transfer Information:

Account Name: Frost Brown Todd LLC

Bank Name: US Bank, 425 Walnut Street, Cincinnati, OH 45202

Account Number: 821609195 – Routing Number: 042000013 – Swift Number: USBKUS44IMT

Doc ID 21523

APP00084

Account 0148401.0748198

Page 3

Date	Tmkr	Narrative	Hours	Amount
09/01/21	ATS	Update G. Terry Sumner re call with M. Valenti and potential trajectories of arguments and briefing, including considerations to present to co-counsel re trial court and potential filings needed with trial court.	0.20	77.00
09/02/21	GT	Review order entered by Court of Appeals; emails with J. Stafford re same.	0.30	165.00
Total:			0.50	\$242.00

ITEMIZED DISBURSEMENTS

Date	Description	Amount
08/30/21	Next Day Air to Kate Morgan, Clerk, Kentucky Court of Appeals	13.21
TOTAL		\$13.21



P.O. Box 70087
Louisville, KY 40270-0087
(502) 589-5400
Facsimile (502) 581-1087
www.frostbrowntodd.com

Kelly Crawford
500 North Akard Street, Suite 2700
Dallas, TX 75201

Fed # 61-0722001
December 9, 2021
Bill # 210249629
Account # 0148401.0748198

Reference: n/a
RE: Local Counsel

For Professional Services Rendered Through November 30, 2021	929.50
--	--------

TOTAL THIS BILL:	929.50
-------------------------	---------------

Outstanding Bills (see page 2 for details – if already paid please disregard)	3,347.67
---	----------

TOTAL AMOUNT DUE:	4,277.17
--------------------------	-----------------

All amounts are in USD

Please send remittance information to AccountsReceivable@FBTLaw.com

Wire Transfer Information:

Account Name: Frost Brown Todd LLC

Bank Name: US Bank, 425 Walnut Street, Cincinnati, OH 45202

Account Number: 821609195 – Routing Number: 042000013 – Swift Number: USBKUS44IMT

Doc ID 21523

APP00086

Account 0148401.0748198

Page 3

Date	Tmkr	Narrative	Hours	Amount
10/15/21	ATS	Review order denying stay; review prior order regarding prehearing conference; discuss same with G. Terry Sumner and forward copy of order to J. Stafford.	0.30	115.50
10/15/21	GT	Analyze order received from Court of Appeals; advise T. Sturgeon re potential Motion for Reconsideration.	0.20	110.00
10/20/21	ATS	Discuss with G. Terry Sumner status of potential response in appeal and/or trial court and reaching out to J. Stafford regarding same.	0.20	77.00
10/20/21	GT	Analyze email from D. Welker at Court of Appeals re scheduling prehearing conference; emails with J. Stafford re same; email from B. Breetz re expected settlement of case by co-defendant; emails with J. Stafford re same.	0.50	275.00
10/21/21	GT	Emails and call with J. Stafford re whether to challenge Court of Appeals refusal to stay appellate proceedings.	0.40	220.00
11/03/21	ATS	Review motion to dismiss appeal and forward same to J. Stafford and J. Rolls.	0.20	77.00
11/03/21	GT	Analyze motion to dismiss appeal filed by appellant.	0.10	55.00
Total:			1.90	\$929.50

APP00087

Invoice #7631



Ahuja & Clark, PLLC
 Certified Public Accountants
 Tax & Accounting • Business Valuation • Business Interruption

Due: 10/21/2021

Total: \$1,208.33

469-467-4660

ddenison@ahujaclark.com

Tax: \$0.00

2901 N. Dallas Parkway Ste. 320 Plano, TX 75093

Invoice for Scheef & Stone, LLP

Attention: Linda Thompson

Please contact Deborah Denison for any queries about this invoice.

Invoice Items

Services	Total
Services rendered during Quarter 3: July 1, 2021 - September 30, 2021 for the preparation of the 2020 Form 1120 - SF	\$1,208.33

Work Detail

Date: 07/06/2021

Date	Subject / Description	Owner	Hours	Rate	Amount
07/06/2021	Review of documents Review documents received	Madhu A.	1h 0m	\$250.00	\$250.00
07/06/2021	Client Communication Communication with client via email with detailed list of needed documents to prepare 2020 tax return.	Divya S.	1h 0m	\$250.00	\$250.00

Date: 07/14/2021

Date	Subject / Description	Owner	Hours	Rate	Amount
07/14/2021	Follow up on Document Requests Follow up with Signature Bank and PayPal on court ordered documents relating to accounts	Carolyn B.	30m	\$250.00	\$125.00

Date: 07/19/2021

Date	Subject / Description	Owner	Hours	Rate	Amount
07/19/2021	Assisting in document collection Call and follow up email with Signature attorney to request account documentation	Carolyn B.	20m	\$250.00	\$83.33

Date: 09/29/2021

Date	Subject / Description	Owner	Hours
------	-----------------------	-------	-------

APP00088



Date	Subject/Description	Owner	Hours	Rate	Amount
09/29/2021	Review of documents received from client and communication with client regarding the documents.				

Sub-total \$1,208.33

Tax \$0.00

Total \$1,208.33

Please click on the link below to submit payment.

Credit Card





Ahuja & Clark, PLLC
 Certified Public Accountants
 Tax & Accounting • Business Valuations • Business Interruption

469-467-4660
 ddenison@ahujaclark.com

2901 N. Dallas Parkway Ste. 320 Plano, TX 75093

Invoice #7800
 Created Date: 12/31/2021

Due: 01/21/2022

Total: \$3,761.85

Tax: \$0.00

Invoice for Scheef & Stone, LLP

Attention: Linda Thompson

Please contact Deborah Denison for any queries about this invoice.

Invoice Items

Services	Total
Services rendered during Quarter 4 2021 for the preparation of the Kelly Crawford as a Receivership for TMTE & Chase Metals Form 1120-SF	\$3,702.09

Expenses	Qty	Price Per Unit	Total
Certified Mail of 1120 SF	1.00	\$6.96	\$6.96
Courier	1.00	\$52.80	\$52.80

Work Detail

Date: 10/02/2021

Date	Subject / Description	Owner	Hours	Rate	Amount
10/02/2021	Preparation	Divya S.	2h 33m	\$250.00	\$637.50
	Preparation of Form 1120-SF, including organize source documents, summarize assets received by the Receivership, break up K-1 investments for 6 K-1's, preparation of related schedules and forms.				

Date: 10/04/2021

Date	Subject / Description	Owner	Hours	Rate	Amount
10/04/2021	Internal Discussion	Divya S.	36m	\$250.00	\$150.00
	Staff discussion regarding questions on Tower Equity LLC, Chase Metals and TMTE Inc				

Date: 10/05/2021

Date	Subject / Description	Owner	Hours	Rate	Amount
10/05/2021	Preparation	Divya S.	3h 15m	\$250.00	\$812.50
	Preparation of Form 1120-SF, including organize source documents, data input, and preparation of related schedules and forms.				

APP00090

Date: 10/06/2021

Date	Subject / Description	Owner	Hours	Rate	Amount
10/06/2021	Preparation	Divya S.	46m	\$250.00	\$191.67
	Preparation of Form 1120-SF, including update data input for K-1's and related schedules and forms.				

Date: 10/07/2021

Date	Subject / Description	Owner	Hours	Rate	Amount
10/07/2021	Review	Stella Y.	53m	\$250.00	\$220.83
	Review Form 1120-SF, including verifying source documents and amounts, review of schedules, and annotate review notes				

Date: 10/08/2021

Date	Subject / Description	Owner	Hours	Rate	Amount
10/08/2021	Review	Stella Y.	2h 30m	\$250.00	\$625.00
	Review Form 1120-SF, including verifying source documents and amounts, review of schedules, and annotate review notes. Verify tax return based off of review notes.				
10/08/2021	Preparation	Divya S.	16m	\$250.00	\$66.67
	Clear review notes				

Date: 10/12/2021

Date	Subject / Description	Owner	Hours	Rate	Amount
10/12/2021	Review	Madhu A.	2h 30m	\$250.00	\$625.00
	Review Form 1120-SF, including verifying source documents and amounts, review of schedules, and notate review notes. Staff discussion regarding questions on Tower Equity LLC, Chase Metals and TMTE Inc				
10/12/2021	Internal Discussion	Divya S.	46m	\$250.00	\$191.67
	Staff discussion regarding questions on the preparation of federal and state returns.				
10/12/2021	Internal Coordination	Jeanne-Marie B.	15m	\$85.00	\$21.25
	Staff coordination regarding extension filing.				
10/12/2021	Tax return release	Stella Y.	18m	\$250.00	\$75.00
	Release tax return				

Date: 10/13/2021

Date	Subject / Description	Owner	Hours	Rate	Amount
10/13/2021	Send Draft Return	Jeanne-Marie B.	1h 0m	\$85.00	\$85.00
	Sent mailing copy of 2020 federal tax return to Receiver for review and signature.				

APP00091

Sub-total \$3,761.85

Tax \$0.00

Total \$3,761.85

Please click on the link below to submit payment.

Credit Card





Computer Forensic Services, Inc
 2807 Allen St
 Dallas, TX 75204
 (214)306-6470x801
 info@cfsiusa.com
 http://www.cfsiusa.com

BILL TO

Scheef & Stone LLP
 2600 Network Boulevard, Suite
 400
 Frisco, TX 75034 USA
 Metals

INVOICE 5337**DATE 01/03/2022 TERMS Net 30****DUE DATE 02/02/2022**

DATE	ACTIVITY	QTY	RATE	AMOUNT
	12/10/2021			
12/10/2021	CF Consultation/Meeting Call with CFTC and James. Metals. - Stephen Watson	0:30	250.00	125.00T
	01/03/2022			
01/03/2022	EDD-Hosting EDD-Data Hosting Metals January	15.683	35.00	548.91T
Federal Tax ID is #75-2966910.				
SUBTOTAL				673.91
TAX (8.25%)				55.60
TOTAL				729.51
TOTAL DUE				\$729.51

APP00093





Computer Forensic Services, Inc
 2807 Allen St
 Dallas, TX 75204
 (214)306-6470x801
 info@cfsiusa.com
 http://www.cfsiusa.com

BILL TO

Scheef & Stone LLP
 2600 Network Boulevard, Suite
 400
 Frisco, TX 75034 USA
 Metals

INVOICE 5398**DATE 02/04/2022 TERMS Net 30****DUE DATE 03/06/2022**

DATE	ACTIVITY	QTY	RATE	AMOUNT
	01/13/2022			
01/13/2022	CF Project Management:CF Project Management Metals / Package ext hd's and prepare shipment with Chain of Custody to Jeremy Christianson via Fedex. Deliver package to FedEx for overnight delivery. Send Attorneys email update with shipping label. Project Management - Summer Ayala, Inc	0:15	150.00	37.50T
	02/04/2022			
02/04/2022	EDD-Hosting EDD-Data Hosting Metals Feb	15.683	35.00	548.91T
Federal Tax ID is #75-2966910.		SUBTOTAL		586.41
		TAX (8.25%)		48.38
		TOTAL		634.79
		TOTAL DUE		\$634.79



Computer Forensic Services, Inc
2807 Allen St
Dallas, TX 75204
(214)306-6470x801
info@cfsiusa.com
<http://www.cfsiusa.com>

BILL TO

Scheef & Stone LLP
2600 Network Boulevard, Suite
400
Frisco, TX 75034 USA

INVOICE 5452

DATE 03/03/2022 TERMS Net 30

DUE DATE 04/02/2022

DATE	ACTIVITY	QTY	RATE	AMOUNT
02/03/2022	EDD-Hosting	15.683	35.00	548.91T
	EDD-Data Hosting Metals March			

Federal Tax ID is #75-2966910.

SUBTOTAL	548.91
TAX (8.25%)	45.29
TOTAL	594.20

TOTAL DUE	\$594.20
------------------	-----------------



Computer Forensic Services, Inc
 2807 Allen St
 Dallas, TX 75204
 (214)306-6470x801
 info@cfsiusa.com
 http://www.cfsiusa.com

BILL TO

Scheef & Stone LLP
 2600 Network Boulevard, Suite
 400
 Frisco, TX 75034 USA
 Metals

INVOICE 5523**DATE 04/06/2022 TERMS Net 30****DUE DATE 05/06/2022**

DATE	ACTIVITY	QTY	RATE	AMOUNT
03/28/2022				
03/28/2022	EDD-Management Metals - Archive Disco Database to Server. Download Productions. Transfer/store onto backup drive. (106GB Project Manager - Summer Ayala, Inc	1:00	250.00	250.00T
04/01/2022				
04/01/2022	EDD-Hosting EDD-Data Hosting Metals April	15.683	35.00	548.91T
Federal Tax ID is #75-2966910.		SUBTOTAL		798.91
		TAX (8.25%)		65.91
		TOTAL		864.82
		TOTAL DUE		\$864.82

standard rate. For the time period of July 26, 2021 through April 30, 2022, I further discounted my fees by 20%. This resulted in a discount of more than 40% from my standard hourly rate.

3. I reviewed the invoices from Scheef & Stone for the legal fees charged for the period from July 26, 2021 through April 30, 2022. I discounted the fees by 15%, which reduced the blended hourly rate to \$150 and reduced the fees billed to the estate by Scheef & Stone by more than \$23,000.


4. The total fees charged to the receivership estate for the period from July 26, 2021 through April 30, 2022 were for work allocated as follows:

- Claims Handling (25%)
- Claims Against Salespersons to Recover Commissions (25%)
- Contempt Actions Against the Defendants (22%)
- Sale of Philadelphia Properties (10%)
- Investigate Claims Against Carlos Cruz (5%)
- General receivership issues (5%)
- IRS/tax issues (2%)
- Accounting/records (2%)
- Actions in Other States (2%)
- Recovery of Other Assets (1%)
- Investigate Source of Retainer Paid to Defendant's Counsel (1%)

5. Due to the stay of the case, neither Scheef & Stone, my ancillary counsel nor I have received payment for any services provided to the receivership since July 26, 2022.

6. I declare under penalty of perjury that the foregoing is true and correct and is within my personal knowledge.

Dated: June , 2022



KELLY M. CRAWFORD
RECEIVER